Environmental Division Satellite Accumulation Point Operator Training

For Training Assistance

Hazardous Waste Training For Satellite Accumulation Point (SAP) Managers

Course Objectives

- ☑ Meet the requirements of the Resource Conservation Recovery Act
- ☑ Ensure that personnel handling hazardous waste at Satellite Accumulation Points (SAP) are trained to perform their duties in accordance with federal, state and local regulatory standards and requirements.

Federal and state regulatory requirements, and the Fort Campbell Environmental Handbook were used to develop this training

Satellite Accumulation Point

SAP Operator Training

Resource Conservation & Recovery Act
Introduction to Hazardous Waste Management
Fort Campbell Environmental Protocol Sheets
Six Part Folder Documentation
Universal Waste Management
POL Collection Point Management

Initial and annual SAP training is required for anyone who performs duties involving hazardous waste management, personnel training or inspection of hazardous waste sites.

EQO training provides SAP training good only for one year from initial training date.

Satellite Accumulation Point Operations

SAP Operator Training – Module One

Regulatory Compliance

Waste Generation Process

Noncompliance Issues

SAP Management Procedures and Best Management Practices

Hazardous Waste Generation

U S Army Generating Activities

Generating and Accumulating Waste

- More than 100 activities/facilities at Fort Campbell generate hazardous waste and universal waste.
- These wastes must be accumulated temporarily at the generating facility at accumulation points or turned in through the PPOC immediately upon generation.
- In addition Used Oil and Used Antifreeze are accumulated at more than 100 sites. Used Oil is recycled to reduce disposal cost and create revenue. Used Antifreeze is distilled, reducing

Satellite Accumulation Point Operations

Environmental Division Responsibilities

- Develop and implement SAP management program, to help ensure compliance with federal, state and Fort Campbell requirements
- Develop and disseminate environmental protocols
- Provide SAP management training, guidance, and assistance to EQO's and SAP Operators
- Monthly SAP/POL site compliance assistance inspections (Unannounced)

Unit / Activity Responsibilities

- Command emphasis on compliance and enforcement
- EQOs and SAP Operators - assigned and trained
- Enforce established procedures and regulatory compliance
- Weekly inspection of satellite accumulation points

Satellite Accumulation Point Operations

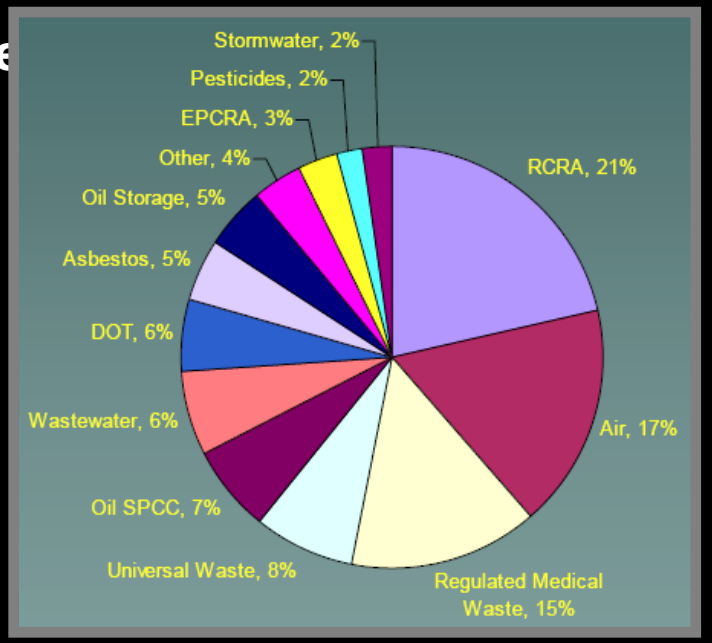
What is the Resource Conservation and Recovery Act (RCRA)?

Defines what is a hazardous waste.

Provide rules on how to manage hazardous waste (from cradle-to-grave).

Specify what persons are covered by the

- Fort Campbell is a prime target for regulators because of the large quantity of waste generated and the number of waste sites on the installation.
- The most common RCRA violations found are open and mislabeled containers.



RCRA violations can be levied at $37,500.00 per violation, per day.

SAP Manager Training

Enforcement

Administrative Action - A compliance order is one type of administrative action under which the EPA or state can require immediate compliance or cleanup and assess a penalty of up to $37,500 per day for each day of noncompliance.

Civil Action - EPA or state can take an installation to court to force compliance or cleanup of environmental contamination.

SAP Manager Training

Criminal Action - can be brought for serious violations of the law. There are seven acts identified in law that carry criminal penalties ranging from a fine of $50,000 per violation and a prison sentence of up to 15 years, to a total fine of $1,000,000.

Serious violations include:

- Falsifying manifests, labels or other required documents
- Concealing or destroying any documents required to be retained or filed
- Transporting hazardous waste without a manifest

Professor Dumps Lab Waste Down Sink

Sentenced to three years probation with 80 hours of community service and a $5,000 fine.

8 March 2007, “The Seattle Times”

A respected University of Washington Pharmacology professor became a felon Wednesday when he acknowledged dumping a flammable substance down a laboratory sink and then trying to conceal his actions.

Daniel Storm, 62, pleaded guilty in federal court to violating the Resource Conservation and Recovery Act by flushing about **four liters of the solvent ethyl ether, a general anesthetic**. **He faces a maximum five years in prison and a $250,000 fine** when sentenced June 18, although prosecutors have recommended probation under the terms of a plea agreement.

In June 2006, UW health and safety inspectors found three metal and two glass containers of ether in Storm’s lab which, because of the age of the substance, required disposal.

But Storm balked at the **estimated $15,000.00 cost**, which would have come out of a lab operations fund. So later that month he **took an ax to some of the containers and flushed the contents down the sink**. He kept one container in tact and **prepared a false voucher from a fictitious company** indicating he’d properly disposed of the substance.

Missouri Man Indicated For Violating RCRA and Other Federal Violation

23 July 1998

Edward R. Sechrist, owner and president of **Essex Waste Management** in Kingsville, Mo., was indicted on July 23, 1998, in U.S. District Court for the Western District of Missouri in Kansas City for violating the Resource Conservation and Recovery Act (RCRA).

Sechrist **allegedly improperly disposed of military gas mask filters by sending them to a sanitary landfill** in Johnson County, Mo. The **filters contained chromium**, which is a known cause of cancer as well as a cause of eye and skin irritation.

If convicted on all charges, Sechrist faces a maximum **imprisonment of up to five years and/or a fine of up to $250,000** on the RCRA charge plus additional penalties for the other violations.

On Jan. 22, the company pleaded guilty in U.S. District

Satellite Accumulation Point Operations

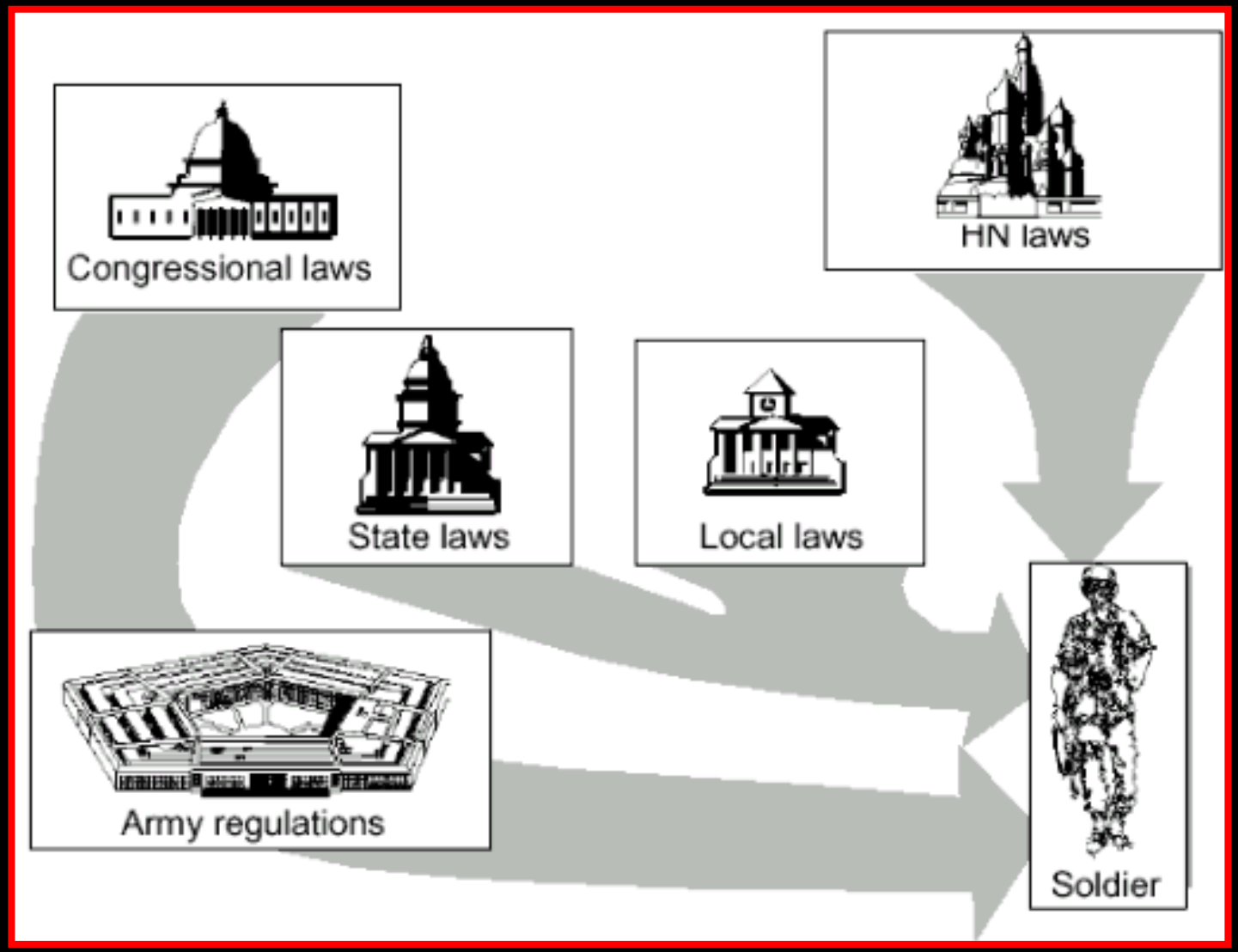
Generator: **means any person, by site, whose act or process produces hazardous waste. Waste generated by contractors working at a facility is considered by EPA to have been generated by that site. EPA holds all parties liable for proper management of the waste.**

Environmental Laws Affecting Soldier Actions: ***Soldiers are responsible for knowing environmental requirements that apply to their duties.*** AR 200-1, and assigns responsibilities for the Army Environmental Program and CAMREG 200-1 establishes FTCKY Installation Environmental and Recycling Policies.

Contact the Hazardous Waste Program Manager to make a definitive hazardous waste determination. Assume that all chemical wastes are hazardous until a definitive determination can be made. This includes low concentration wastes or chemicals where you are unsure of the properties.

The Hazardous Waste Program Manager makes determinations through chemical analysis or by using generator knowledge (MSDS) of the product.

Satellite Accumulation Point Operations



Waste Minimization

- Inventory Control and Product Substitution
- Shelf Life Mgmt
- Reuse
- Recycling
- Hazmat Custodian
- One for One Exchange
- Empty Container Turn

Better Management!

Hazardous Waste Generation

U S Army Generating Activities

- CRBN operations
- Corrosion control operations that use chromate rust inhibitors
- Plating operations using cyanides
- Parts cleaning operations using organic solvents such as trichloroethane
- Chemical and abrasive stripping of aircraft
- Aircraft painting operations
- Photo and X-ray laboratories
- Pharmacies
- Hospitals

Hazardous Waste Generation

Examples of Hazardous Wastes Generat

- Chemical Decon Kits and Mask Filters
- Waste MOGAS (gasoline)
- Spent solvents and paint thinners
- Contaminated paint removers
- Wiping rags
- Battery acid
- Dry-cleaning solvents
- Contaminated inks
- Cleaning fluids
- Pesticide residues
- Pharmaceutical Waste

Examples: Hazardous Wastes Generate

Waste Process

CBRN

Waste Streams

SAP

M256, M258 Decon Kits
C2 Mask Canisters (blac
C2A1 Mask Canisters (gr
(NON-RCRA)

Paint Booth

SAPs

Waste paint thinner
Waste paint remover
Waste rags and paper
Waste paint arresting fi
Waste water borne CAR
(NON-RCRA)

Examples: Hazardous Wastes Generate

Waste Process

Blade Shop

Engine Shop

Waste Streams

SAPs

SAP #1 Hazardous W
Paint Solvent with
Chromate

SAP #2 Hazardous W
Chrome Pickle Solut

SAPs

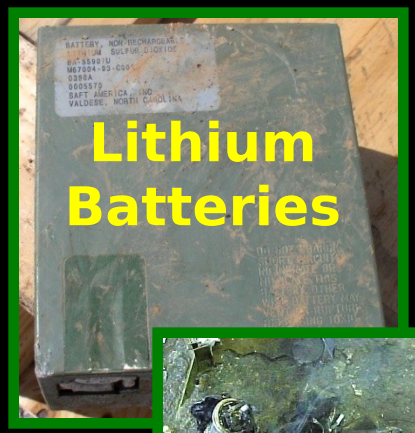
SAP #1 Hazardous W
Solvent and Cleaner
with Lead and Cadm

SAP #2 Hazardous W
Blasting Media with
and Cadmium.

Satellite Accumulation Point Operations

Mishandling and Improper Disposal

Hazardous Waste Noncompliance Issues

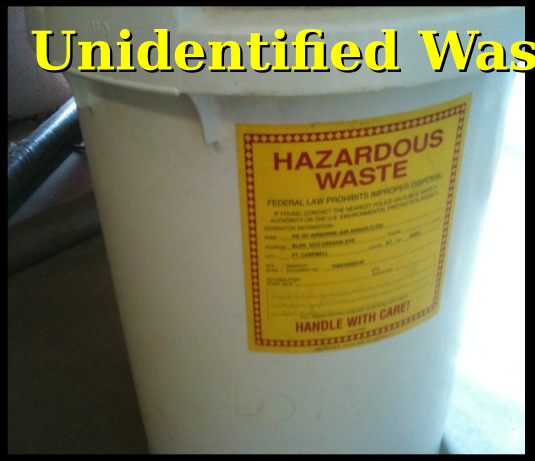


Satellite Accumulation Point Operations

Abandoned or Mismanaged Waste

Hazardous Waste Noncompliance Issues

Abandoned Waste
Mismanaged Waste
Unidentified Waste



Satellite Accumulation Point Operations

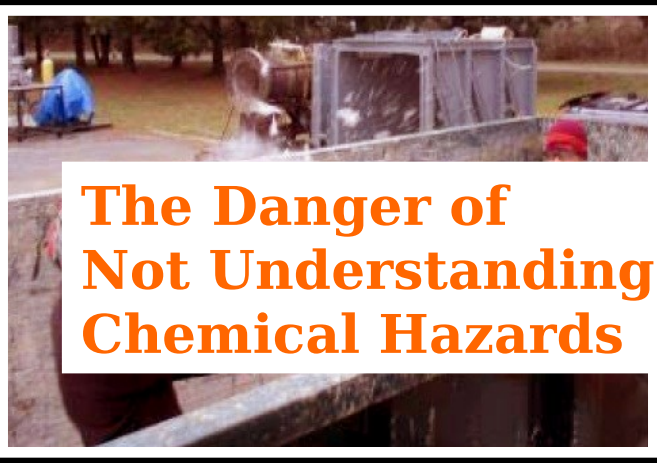
Mishandling & Improper Disposal

Noncompliance Issues

Satellite Accumulation Point Operations

Mishandling & Improper Disposal

Noncompliance Issues



The Danger of Not Understanding Chemical Hazards

Affects of Noncompliance

Waste Characterization

Abandoned Waste

Emergency Response

Hazardous Waste in Dumpsters

Satellite Accumulation Point Operations

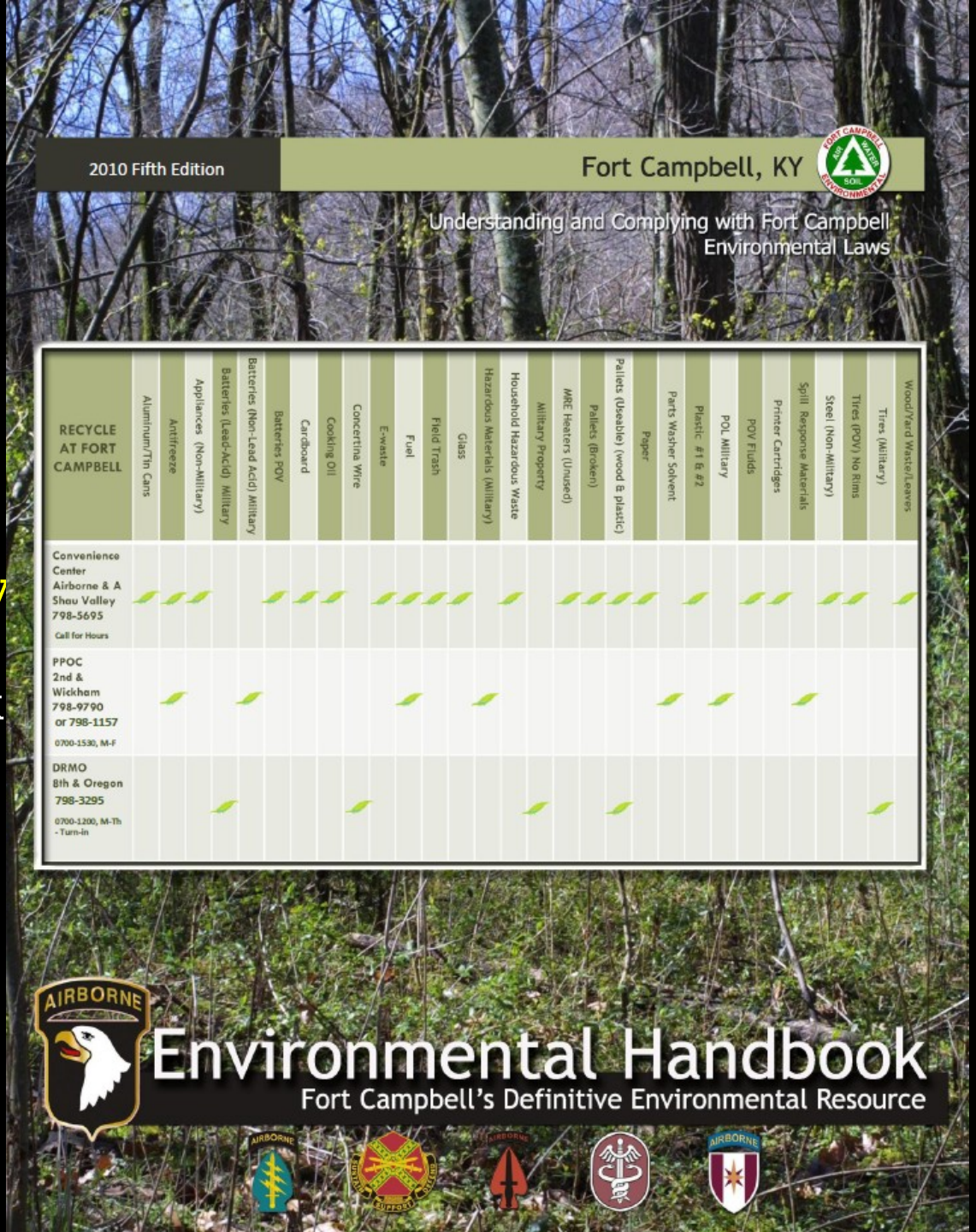
Open and Improperly Labeled Containers

Noncompliance Issues

Updated Periodically

Always Check The Most Recent Edition

Edition 5

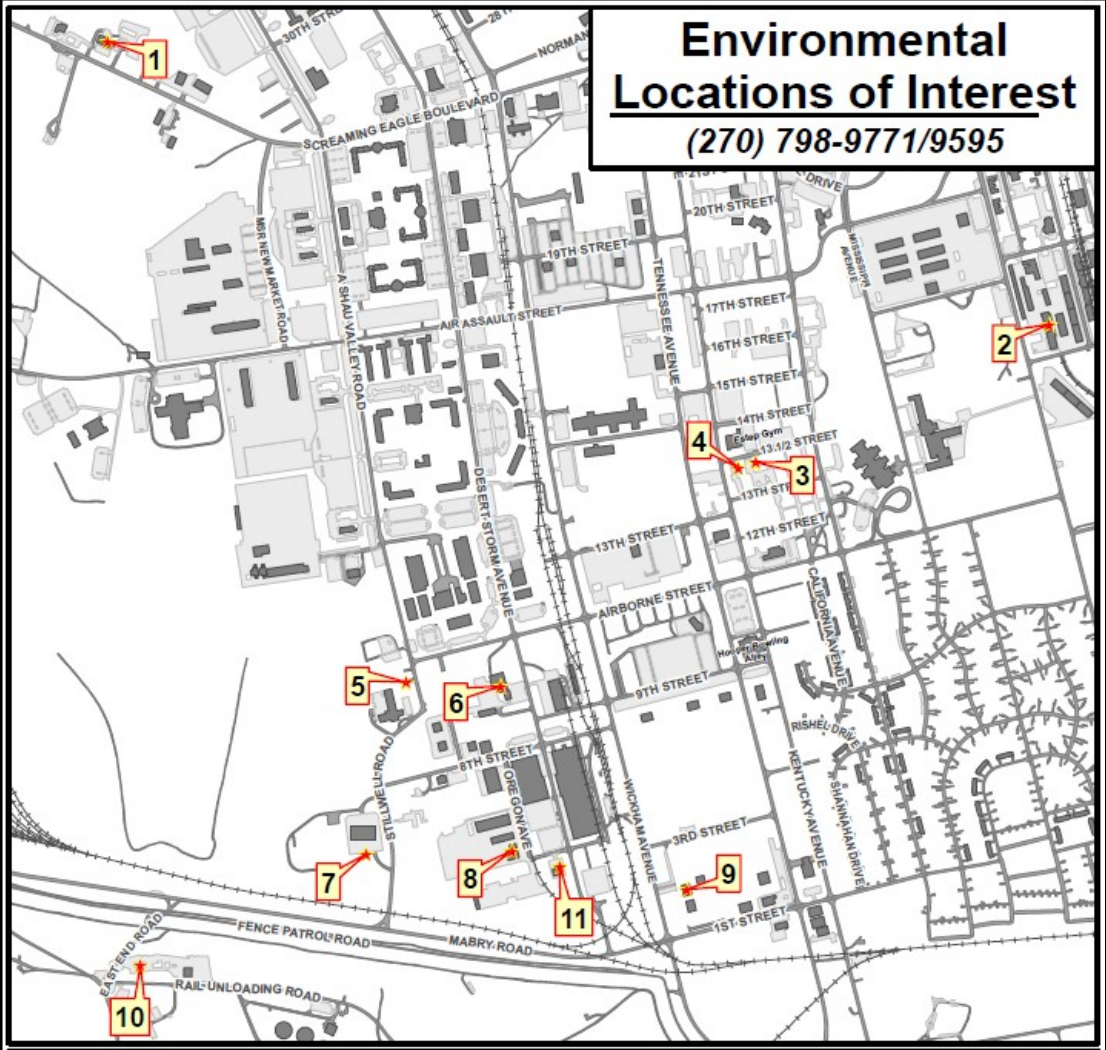


FORT CAMPBELL AIR WATER SOIL ENVIRONMENTAL

ENV HB Back

Environmental Locations of Interest

(270) 798-9771/9595



Site Number, Description (Bldg. #)

1. ITAM / Range Control (6085/6087)
2. Troop Self Help (863)
3. Environmental Division Main (2182)
4. Environmental Division Pollution Prevention Branch (2186)
5. Convenience Center #1 (6802)
6. Recycling Center (5225)
7. South Wash Rack (6001)
8. DRMO (5212)
9. PPOC (5134)
10. Environmental Division Forestry (7604)
11. Antifreeze / Fire Extinguisher / Refrigerant Management (5209)

★ Environmental Location of Interest

Buildings | Parking Lots | Roads

N

0.1 0.05 0 0.1 0.2 0.3 0.4 0.5 Miles

Produced By:
Rick Zimmer
Public Works, Environmental Division
14 September, 2...

Fort Campbell Portal - Microsoft Internet Explorer provided by Ft Campbell
https://portal.campbell.army.mil/Pages/Default.aspx
Live Search
Favorites
Page Safety Tools
Fort Campbell Portal
CLASSIFIED UP TO UNCLASSIFIED//FOUO

View All Site Content
Fort Campbell and 101st Airborne Division (Air Assault) OPORDERS
Fort Campbell Maps and Plans
Fort Campbell Phone Book (PDF)
People Search
Search
Fort Campbell Publications
Sharepoint User Training

Fort Campbell Portal

Mission Statement

Mission - To Support Expeditionary Forces by Providing Standardized, Effective & Efficient Sustainable Services that Enhance the Well-Being of the Fort Campbell Community.

ZULU: FRI 12:55:47 **FT. CAMPBELL: FRI 07:55:47** **AFGHANISTAN: FRI 17:25:47** **IRAQ: FRI 15:55:47**

Garrison Commander Items of Interest

Screaming Eagle Bulletin ! NEW
by Florez, Valerie M CIV USA IMCOM — 9/23/2010 11:02 AM

Command and Staff Directory ! NEW
by Florez, Valerie M CIV USA IMCOM — 9/23/2010 8:45 AM

Fort Campbell Off Limit Areas
by Jenkins, David M CTR USA — 9/22/2010 3:47 PM
Please open attachment to check off limit areas.

CAM Cir 215-10-1 Hunting, Fishing and Outdoor Recreational Activities
by Haupt, Jurgen Mr CIV USA IMCOM — 9/21/2010 3:20 PM
CAM Cir 215-10-1 has been re-issued for 2010-2011.

Screaming Eagle Bulletin
by Florez, Valerie M CIV USA IMCOM — 9/16/2010 9:43 AM

(More Announcements...)

Fort Campbell Resource Guide

Fort Campbell Weather Alerts

There are currently no Weather Watches or Warnings for Ft. Campbell, KY.

Keep the Green Light Burning

Days since last POV fatality - 146

POV Fatalities This Year - 6

POV Fatalities Last Year- 5

Fort Campbell Links

- FCintranet (Old Portal)
- Fort Campbell Publications
- Community Calendar
- Fort Campbell Home Page (Public)
- Army Community Covenant
- Remedy
- Emergency Operations Center (EOC)
- Knowledge Management Site (KMS)
- Acceptable Use Policy (AUP)
- Digital Training Management System
- Eagle University
- User Provisioning Tool
- United States Army Combined Arms Center (CAC)
- Fort Campbell Environmental

Fort Campbell Outreach Links

- Crisis Assistance
- Suicide Awareness Pamphlet
- Campbell Connection
- Army FRG | Homepage

Other Usefull Links

- ICE
- AKO

Welcome - Microsoft Internet Explorer provided by Ft Campbell

http://www.campbell.army.mil/campbell/directorates/DPW/envdiv/Pages/default.aspx

Favorites | Welcome

Fort Campbell Home

WWW.CAMPBELL.ARMY.MIL
THE OFFICIAL HOMEPAGE OF FORT CAMPBELL, KY

Fort Campbell Home | Our Installation | Our Units | Families | Services | Quick Links | External Links

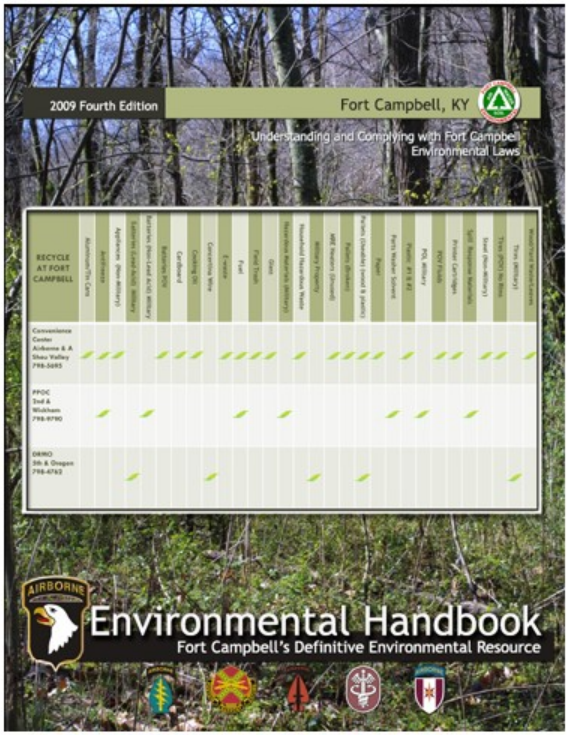
Fort Campbell Home > Our Installation > Directorates > Directorate of Public Works > Fort Campbell Environmental > Pages > default.aspx

Fort Campbell Environmental

Environmental Division Links

Fort Campbell Environmental

- Acronyms
- Agricultural Outlease
- Air Quality
- Asbestos
- Battery Management
- Catch the Fever Mercury Thermometer Exchange Program
- Contact Us
- Contingency (UBL)
- Cultural Resources
- Earth Day 2010
- Environmental Handbook
- EPAS
- EQO Information and Education
- Fish and Wildlife
- Forestry
- Glossary of Environmental Terms
- Hazardous Materials
- Hazardous Waste
- Kids Environmental Games
- Lead Based Paint
- Maps
- NEPA
- PPOC
- Recycling and Solid Waste
- Recycling Construction and Demolition Debris
- Recycling Corner
- Restoration
- Satellite Accumulation Points (SAP'S)
- Spill Management
- Storage Tanks (UST)
- Sustainable Installation Management System (SIMS/EMS)
- Threatened and Endangered Species
- Urban Forestry


2009 Fourth Edition
Fort Campbell, KY
Understanding and Complying with Fort Campbell Environmental Laws
Environmental Handbook
Fort Campbell's Definitive Environmental Resource

The 2009 Environmental Handbook Available Now

→ SAP Training Slides

Forms to Open/Close SAP and POL Sites

Explore Handbook by Topic

A

Absorbents Used – pads/towels/booms A1
Absorbents Used (Bulk) – dry sweep/peat/kitty litter/sand/soil/clay A2
Adhesives/Sealants/Epoxy A3
Aerosol Cans A4
Acetone – A70
Acetylene Cylinders A39
Aluminum Cans A64
Air Conditioners A65
Ammo/brass A5
Antifreeze A6

Appliances

- Furniture/Appliances (Government) A37
- Furniture/Appliances (Non-Government) A38
- Refrigerator Disposal (Government) A65

Asbestos

- Brake Shoes (Disposal) A8
- Building Demolition/Remodeling/Maintenance (asbestos/lead) A7
- Floor Tile and Mastic Removal A9
- Safes, Gloves (Disposal) A10
- Stripping Floor Tiles A11

ATNAA A12
Atropine Injectors A12

AVGAS

- Fire Extinguisher Building A29
- Fuel (Recyclable Small Quanity) A35

B

Ballasts/Capacitors A13
more...

Satellite Accumulation Point Operations

Environmental Waste Made Easy - Environmental Protocol Sheets

- Proper waste management can be very difficult, especially if you don't do it every day. For example, the procedures for handling asbestos are much different than those for managing waste paint thinner.

- Many items exist that require mandatory recycling, or recycling as a best management process.

Environmental Protocol Sheets (EPS) - simplify the recycling/waste management process by providing specific handling procedures for wastes commonly

Satellite Accumulation Point Operations

Environmental Waste Made Easy - Environmental Protocol Sheets

The EPS are easy to follow, laying out step-by-step how to manage each waste stream. These EPS can be found in Appendix A.

To use the EPS, turn to Appendix A and find the "Environmental Protocol Sheet Index". Find the particular waste or issue you are looking for and turn to that sheet. The handling procedures are self-explanatory. If you cannot find your waste or environmental issue in the index, contact the Environmental Division for guidance.

Satellite Accumulation Point

How to Establish a SAP

ENV HB Page

1. Refer to the appropriate protocol sheet for the waste, or call Environmental Division Hazardous Waste if unsure.

2. Forward a memo, signed by the Commander and EQO requesting
establishment of the SAP, to the Hazardous Waste Program Manager. Also provide a diagram depicting the SAP location.

3. When the SAP is approved, the ENV DIV will assist the primary
individual in constructing a Six-Part Folder, a tool used to manage hazardous and universal waste from cradle to grave, to include records of inspection, training and turn-in of hazardous waste.

CBRNE (DETECTOR/DECON KITS)

M256, M256A1, M291, M291A2, M258, M258A1, M72A2, M58A1, M295

POSSIBLE AREAS OF CONCERN

Contaminants of concern in the kits represent possible flammable and toxic hazards. Refer to MSDS for specific use and handling procedures.

CHARACTERIZATION

The refill kit, when disposed of, is a **hazardous waste** for ignitability and toxicity.

HANDLING PROCEDURES

Step 1 Contact **Environmental Division Hazardous Waste** to establish a Satellite Accumulation Point (SAP) for hazardous waste.

Step 2 Unit will be issued a container for kits.

Step 3 When SAP container is full, contact PPOC for appointment.

Step 4 Take container to PPOC at scheduled appointment time. Unit will be required to segregate kits by type.

Step 5 Bring chain of custody (Part 6) of 6-part folder when turning in. PPOC personnel will sign showing acceptance.

CBRNE Detector/ Decon Kits

Check the JEAP website for chemical items that may be able to be returned for training purposes:
https://www.drms.dla.mil/asset/nbccheck.html
M8; M9,M291; M295, M100,

NOTE: SAP Containers are reusable and property of the government. Continue to use the container and do not remove from unit location unless they are turned in to PPOC.

NOTE: SAP operations require OSHA annual training as presented in SAP refresher training.

NOTE: If the unit is deployed for training or mobilized for a period greater than 10 days, the SAP must be closed by memo to the Environmental Division.

GENERAL INFORMATION

M256/M256A1 and M258/M258A1 kits are tuned in to PPOC.
M291/M291A2 and M295 kits are turned through the JEAP (DoD Joint equipment Assessment Program)
CBRNE kits not covered by this protocol, contact **Environmental Division Hazardous Waste.**
NOTE: M8 and M9 detector paper is disposed through DRMO, contact supporting **SSA** or **DRMO Environmental**. See page A-22, CBRNE Protective Mask Filters.

FORT CAMPBELL AIR WATER SOIL ENVIRONMENTAL

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ENV HB Page A21

M256 & M258
hemical Detect
Turn in
at the PPOC

M100, M291,
M295
Turn in
Through JEAP

M8 & M9
Detector Pape
Contact SSA
or
DRMO
Environmenta

ENV HB Page A-21

ENVIRONMENTAL GUIDANCE HANDBOOK
This is an UNCONTROLLED DOCUMENT printed for reference only. The controlled document is on-line on the Fort Campbell Internet under Directorate of Public Works, Environmental Division.
http://www.campbell.army.mil/campbell/directorates/DPW/envdiv/Pages/default.aspx

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HANDLING PROCEDURES

M256 & M258
hemical Detecto
Turn in
at the PPOC

M100, M291,
M295
Turn in
Through JEAP

M8 & M9
Detector Pape
Contact SSA
or
DRMO
Environmenta

Joint Equipment Assessment Program

Joint Program Executive Office
Chemical and Biological Defense

DARD Process

- **The DARD provides disposition instructions for all obsolete/unserviceable CBRN Individual Protective Equipment (IPE).**
  - **Disposal instructions and training gear procurement may be obtained by emailing: smblogcomjeap@usmc.mil**
  - **IAW Defense Message 132345Z Jul 07 CBRN-D IPE Disposal**
- **DARD processes CBRN IPE into three categories:**
  - **Serviceable: Serviceable excess items must be turned into the item manager for cross-leveling and redistribution to the warfighter. They are not approved for disposal.**
  - **Suitable For Training Only: Items that are categorized as training gear are marked in white paint as "Training Only" in a visible location on that piece of equipment and are made available to units for a nominal fee.**
  - **Unserviceable: Disposition instructions will be provided to customers with approved disposable CBRN IPE**

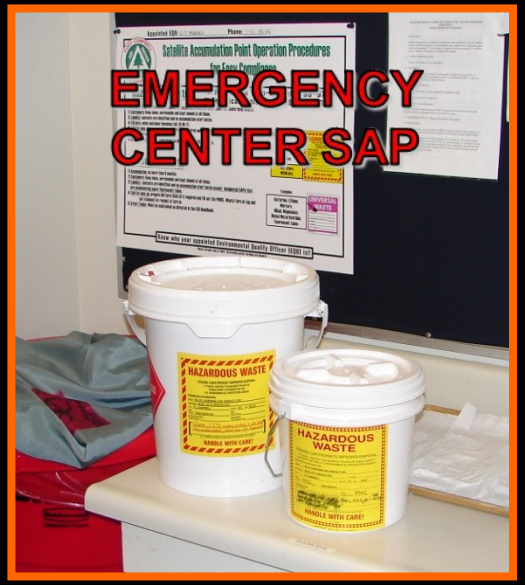
Hazardous Waste Training

Hazardous Waste Generator

- The HW generator is the first link to the cradle-to-grave management of HW
- **A hazardous waste generator is:**
  - The facility (or person) that first creates the hazardous waste
  - The facility (or person) that first makes a waste subject to RCRA or state regulation

Satellite Accumulation Point Operations

SAP Examples



What Is a Hazardous Waste?

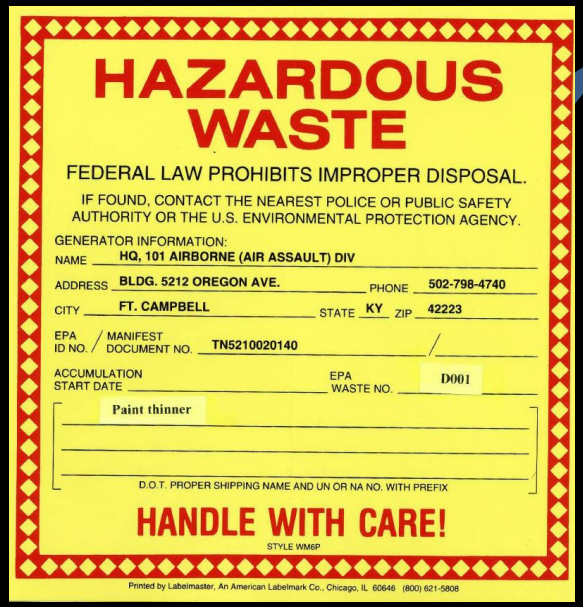
- **A HW is a solid waste (a <u>solid</u>, <u>liquid</u>, or <u>gaseous</u> substance) that no longer has a use for its intended purpose.**

- **EPA defines waste as hazardous if it has certain properties that could pose dangers to human health and the environment after it is discarded.**

Satellite Accumulation Point Operations

Labeling and Marking

Hazardous Waste Label


HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.
GENERATOR INFORMATION:
NAME HQ, 101 AIRBORNE (AIR ASSAULT) DIV
ADDRESS BLDG. 5212 OREGON AVE. PHONE 502-798-4740
CITY FT. CAMPBELL STATE KY ZIP 42223
EPA ID NO. / MANIFEST DOCUMENT NO. TN5210020140
ACCUMULATION START DATE
EPA WASTE NO. D001
Paint thinner
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE!
STYLE WM6P
Printed by Labelmaster, An American Labelmark Co., Chicago, IL 60646 (800) 621-5808

Fill date when full on a piece of tape

Satellite Accumulation Point Operations

SAP Procedures

ENV HB Page

- Facilities may accumulate as much as 55 gallons of HW or one quart of acutely HW in containers at or near the point of generation where wastes initially accumulate. This area is commonly referred to as a HW Satellite Accumulation Point (SAP).
- The SAP must be under the control of the operator of the process generating the waste. "Under control" means that the person generating the waste controls what waste is put in the container ensuring no cross-contamination with other wastes.
- Each container in a SAP must be kept closed except when adding or removing contents. The containers must be in good condition and labeled.

Satellite Accumulation Point Operations

RCRA INSPECTION PROGRAM

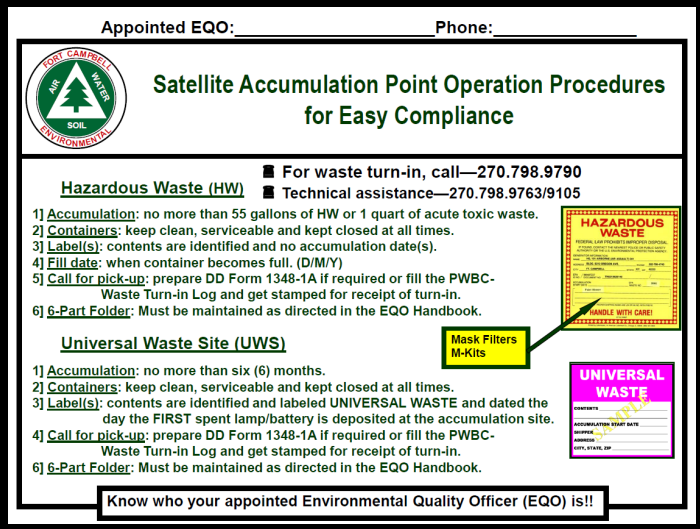
Accumulation at the SAP. Are like wastes stored together (No mixing; proper segregation)? RCRA Mixture Rule.

Best Management Practices (BMP) and OSHA Requirements

The storage area must be marked "Satellite Accumulation Point." A poster is provided for easy compliance. The poster is also a training tool for new personnel. Annual training is required by 29 CFR (OSHA).

Is a fire-extinguisher located in proximity to th

- **Is it the right type?**
- **Is it charged?**
- **Is the inspection tag up-to-date?**
- **Is the seal in place?**



Appointed EQO:_____Phone:_____

Satellite Accumulation Point Operation Procedures for Easy Compliance

- For waste turn-in, call—270.798.9790
- Technical assistance—270.798.9763/9105

Hazardous Waste (HW)

1] Accumulation: no more than 55 gallons of HW or 1 quart of acute toxic waste.
2] Containers: keep clean, serviceable and kept closed at all times.
3] Label(s): contents are identified and no accumulation date(s).
4] Fill date: when container becomes full. (D/M/Y)
5] Call for pick-up: prepare DD Form 1348-1A if required or fill the PWBC-Waste Turn-in Log and get stamped for receipt of turn-in.
6] 6-Part Folder: Must be maintained as directed in the EQO Handbook.

HAZARDOUS WASTE — HANDLE WITH CARE!

Universal Waste Site (UWS)

Mask Filters M-Kits

1] Accumulation: no more than six (6) months.
2] Containers: keep clean, serviceable and kept closed at all times.
3] Label(s): contents are identified and labeled UNIVERSAL WASTE and dated the day the FIRST spent lamp/battery is deposited at the accumulation site.
4] Call for pick-up: prepare DD Form 1348-1A if required or fill the PWBC-Waste Turn-in Log and get stamped for receipt of turn-in.
6] 6-Part Folder: Must be maintained as directed in the EQO Handbook.

UNIVERSAL WASTE

Know who your appointed Environmental Quality Officer (EQO) is!!

Satellite Accumulation Point Operations

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste. 40 CFR §262.34(c)(1).

Comply with container requirements

§265.171, §265.172, and §265.173(a) of this chapter.

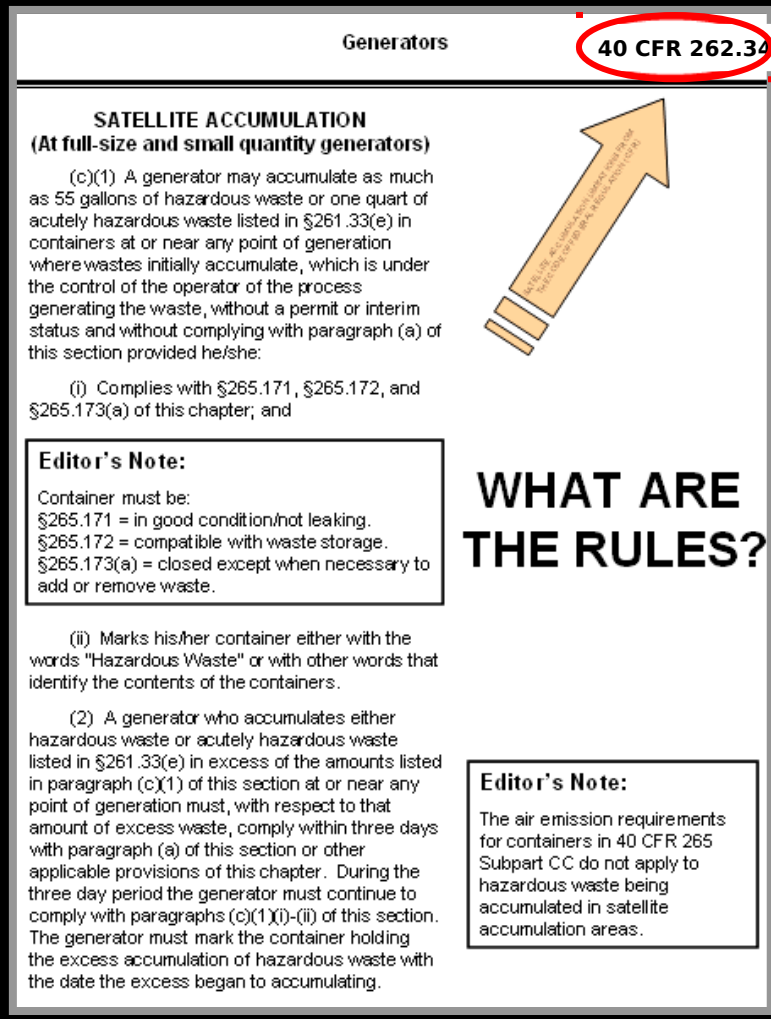
In good condition/not leaking. 40 CFR §265.171.

Compatible with waste storage. 40 CFR §265.172.

Closed except when necessary to add or remove waste. 40 CFR §265.173(a).

Mark the container either with the words "Hazardous Waste" or with other words that identify the contents of the containers. 40 CFR §262.34(c)(1)(ii).

Mark the container holding the excess accumulation of hazardous waste with the date the excess began to accumulate. 40 CFR §262.34(c)(2). Do not date the label - use piece of tape (BMP).



Generators

40 CFR 262.34

SATELLITE ACCUMULATION
(At full-size and small quantity generators)

(c)(1) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he/she:

(i) Complies with §265.171, §265.172, and §265.173(a) of this chapter; and

Editor's Note:

Container must be:
§265.171 = in good condition/not leaking.
§265.172 = compatible with waste storage.
§265.173(a) = closed except when necessary to add or remove waste.

WHAT ARE THE RULES?

(ii) Marks his/her container either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

(2) A generator who accumulates either hazardous waste or acutely hazardous waste listed in §261.33(e) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i)-(ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess began to accumulating.

Editor's Note:

The air emission requirements for containers in 40 CFR 265 Subpart CC do not apply to hazardous waste being accumulated in satellite accumulation areas.

Appointed EQO:_____ Phone:_____

Satellite Accumulation Point Operation Procedures for Easy Compliance

Hazardous Waste (HW)

- For waste turn-in, call—270.798.9790
- Technical assistance—270.798.9763/9105

1] Accumulation: no more than 55 gallons of HW or 1 quart of acute toxic waste.
2] Containers: keep clean, serviceable and kept closed at all times.
3] Label(s): contents are identified and no accumulation date(s).
4] Fill date: when container becomes full. (D/M/Y)
5] Call for pick-up: prepare DD Form 1348-1A if required or fill the PWBC-Waste Turn-in Log and get stamped for receipt of turn-in.
6] 6-Part Folder: Must be maintained as directed in the EQO Handbook.

Mask Filters
M-Kits

Universal Waste Site (UWS)

1] Accumulation: no more than six (6) months.
2] Containers: keep clean, serviceable and kept closed at all times.
3] Label(s): contents are identified and labeled UNIVERSAL WASTE and dated the day the FIRST spent lamp/battery is deposited at the accumulation site.
4] Call for pick-up: prepare DD Form 1348-1A if required or fill the PWBC-Waste Turn-in Log and get stamped for receipt of turn-in.
6] 6-Part Folder: Must be maintained as directed in the EQO Handbook.

Know who your appointed Environmental Quality Officer (EQO) is!!

Satellite Accumulation Point Operations

To Schedule turn-in or drop-off appointment for Hazardous/Universal Wastes

Call: 798-9790

Satellite Accumulation Point Operations

SAP Operator Training – Module Two

Hazardous Waste
Cradle-to-Grave Management
and
The Waste Management Process

Satellite Accumulation Point Operations

Cradle To Grave Management

Satellite Accumulation Points: SAP's are remote locations where waste is being generated at or near the point of generation and under the control to the operator. SAP's are **volume driven** and not regulated by time during storage of the hazardous waste that is being accumulated.

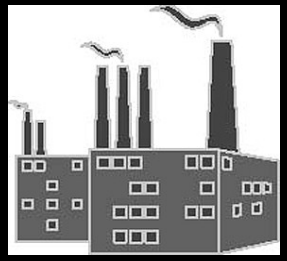
90-Day Satellite Accumulation Point: Storage area is **time drive** regulated by the volume of hazardous waste stored. Hazardous wast being accumulated must be disposed of within 90 days. The Enviror Division's PPOC is the only authorized 90-day site on Fort Campbell.

Fort Campbell

Hazardous Waste 90-Day Yard

Transporter

TSDF



What Is a Hazardous Waste?

- **The good news is that you don't have to make the hazardous waste determination.**
- **DPW-ENV P2 Branch Hazardous Waste Program Manager and assigned personnel will decide whether your waste is a RCRA-regulated hazardous waste, a non-regulated waste, or a non-hazardous waste.**
- **Follow the protocols outlined in the Fort Campbell Environmental Handbook and ask for assistance if you need help.**

HAZARDOUS WASTE DETERMINATIO

Is it Regulated?

Most solid waste that is generated is not hazardous.
determine whether a specific substance being discard
is regulated as hazardous by RCRA,
four questions must be answered:

Is it the substance a Solid Waste?
Is it Excluded by Regulation?
Is it Exempted by Regulation?

HAZARDOUS WASTE DETERMINATIO

Is it Regulated? the Substance a Solid Was

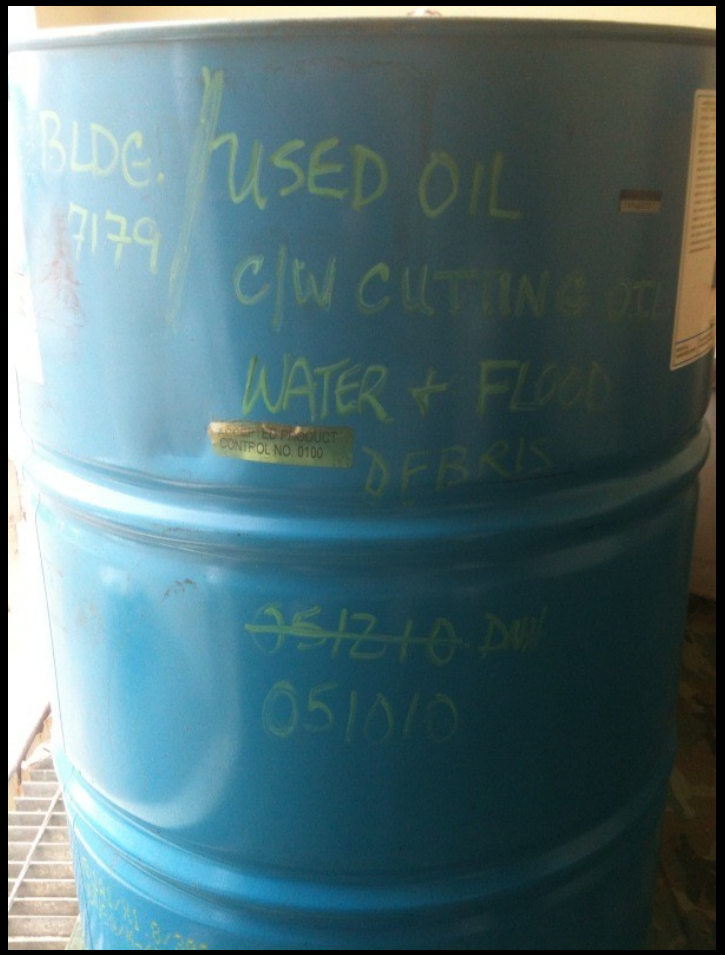
Solid wastes, by definition, are not strictly solid. Solid wastes include liquids and containerized gases.

The Hazardous Waste Program Manager will determine if the waste meets the definition of a solid waste, or if it is excluded or exempted.

EXCLUDED	EXEMPTED
• Domestic Sewage • Recycled by being used, reused, or returned to the original process without first being reclaimed (such as “off-spec” jet fuel)	• Samples collected for testing to determine characteristics • Certain recyclable substances (such as scrap metal)

HAZARDOUS WASTE DETERMINATIO

Is it Regulated? the Substance a Solid Was



HAZARDOUS WASTE DETERMINATIO

Is it Regulated? the Substance a Hazardous W

The final step is to determine if the solid waste is hazardous.

- EPA considers a waste to be hazardous if it is included on a list of specific wastes determined by the EPA to be hazardous (a **listed** hazardous waste).
- Or if it possesses certain **characteristics** (ignitable, corrosive, reactive, or toxic)

HAZARDOUS WASTE DETERMINATIO

Is it Regulated? it a Listed Hazardous Was

There are three groups of listed wastes determined by the EPA to be hazardous and placed on selected lists.

F-list wastes: wastes generated by generic activities, such as degreasing and surface preparation; includes certain spent solvents, plating wastes, metal treating wastes, and certain chlorinated organic compounds.
Example: F003 – Mixture of Used Oil and Spent Acetone

K-list wastes: wastes generated by specific sources or industries, including organic chemicals, inorganic pigments, waste from petroleum refining, veterinary, pharmaceutical, cooking industries, and explosives.

HAZARDOUS WASTE DETERMINATIO

Is it Regulated? it a Listed Hazardous Was

P-list and U-list wastes: discarded unused commercial products, off-specification commercial chemical products, container residues, or spill residues, where the only active ingredient in the formulation is one of the generic chemicals listed.

These are wastes that would cause death, disabling personal injury, or serious illness and are more hazardous than ordinary hazardous wastes.

HAZARDOUS WASTE DETERMINATIO

Is it Regulated? sted Hazardous Wastes

P List Highly Toxic / Acute Hazardous Wastes

P 081	55-63-0	Nitroglycerine
P 042	51-43-4	Epinephrine
P 030	13755-38-9	Sodium Nitroprusside

U List Toxic Wastes

U151	7439-97-6	Mercury
U154	67-56-1	Methanol (I)
U010	50-07-7	Mitomycin C

HAZARDOUS WASTE DETERMINATIO

Is it Regulated? **It A Characteristic Hazardous Waste?**

EPA Ignitable

- A liquid that has a flash point less than 140 ° F;
- A non-liquid capable, under normal ambient conditions, of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard;
- A compressed gas defined as ignitable by DOT regulation (49 CFR § 173.300); or
- An oxidizer as defined by DOT regulation (49 CFR 173.151).

Identified by EPA hazardous waste number **D001**

HAZARDOUS WASTE DETERMINATIO

Is it Regulated? **It A Characteristic Hazardous Waste?**

EPA Ignitable

Identified by EPA hazardous waste number **D001**

HAZARDOUS WASTE DETERMINATIO

Is it Regulated? **It A Characteristic Hazardous Waste?**

EPA Corrosive

- Aqueous solutions having a pH less than or equal to 2 (strong acid) or greater than or equal to 12.5 (strong base); or
- A liquid which corrodes steel faster than 0.25 inch per year at 130 ° F.

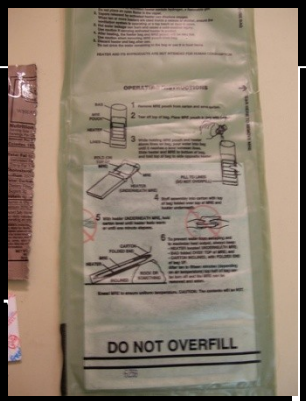
Corrosive wastes are identified by the EPA hazardous waste number **D002**

HAZARDOUS WASTE DETERMINATIO

Is it Regulated?

It A Characteristic Hazardous Waste?

EPA Reactive



- It reacts violently with water;
- It forms potentially explosive mixtures with
- When mixed with water, generate toxic gases, vapors or fumes in a quantity sufficient to harm humans or the environment;
- It is normally unstable and readily undergo violent changes without detonating;
- It contains cyanide or sulfide which, when exposed to conditions of pH between 2 and 12.5, generates toxic gases, vapors, or fumes in a quantity sufficient to harm humans or the environment;

HAZARDOUS WASTE DETERMINATIO

Is it Regulated?

It A Characteristic Hazardous Waste?

EPA Reactive

- It is capable of detonation or an explosive reaction if subjected to a strong initiating source or if heated under confinement;
- It is capable of detonation or explosive decomposition or reaction at normal ambient conditions; or
- Classified as a DOT forbidden explosive, a Class A explosive (1.1 or 1.2 explosives), or Class B explosive (1.2 or 1.3 explosives).

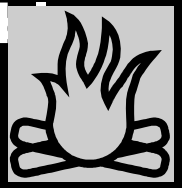
Reactive wastes are identified by the

Is the Substance a Hazardous Waste?

Solid Waste: "any garbage, refuse, sludge… and other discarded material, including solid, liquid, semisolid, or contained gaseous material which is abandoned, recycled, and inherently waste-like.

Hazardous Waste: Must be a solid waste, listed in 40 CFR Part 261, Subpart D. Must be a **listed** waste or exhibit at least one **characteristic** in 40 CFR Part 261, Subpart C, "Characteristics of a Hazardous Waste."

Ignitable



< 140ºF

Flammable liquids
Oxidizers
Organic peroxides
Ignitable compressed gases

Corrosive

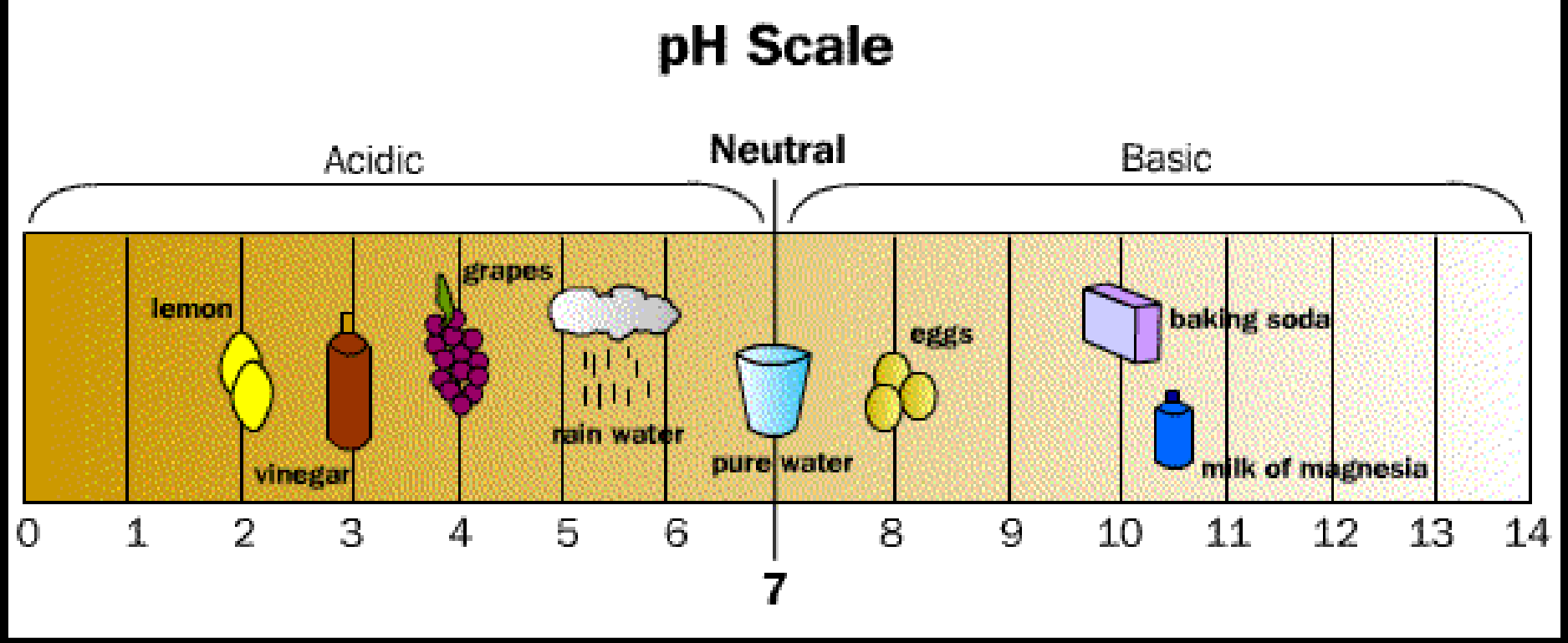
pH ≤ 2 ≥ 12.5

Inorganic acids
Organic acids
Bases

Reactive

Unstable / undergo violent change

Sulfides and cyanides
Peroxide formers
Alkali metals
Dinitro – and trinitro – compounds



Hazardous Waste

Ignita

< 140ºF

Flammable liquids
Oxidizers
Organic peroxides
Ignitable compressed gases

Corros

pH ≤ 2 ≥ 12.5

Inorganic acids
Organic acids
Bases

Reactive

Unstable / undergo violent change

Sulfides and cyanides
Peroxide formers
Alkali metals
Dinitro – and trinitro – compounds

Toxic

Acute oral, dermal inhalation LC/LD

8 Heavy metals
10 Pesticides
22 Organic chemicals

HAZARDOUS WASTE DETERMINATIO

Is it Regulated?

It A Characteristic Hazardous Waste?

EPA Toxic

Wastes exhibit the characteristic of toxicity if, after using **EPA's Toxicity Characteristic Leaching Procedure (TCLP)**, the extract from a representative sample of the waste exceeds the regulatory level of any of the contaminants listed in Table 1, 40 CFR 261.24.

Maximum Concentration of Contaminants for the Toxicity Characteristic

EPA HW Number	Contaminant	Regulatory Level (mg/L)
D018	Benzene	0.5
D007	Chromium	5.0

Chemical Analysis

Characteristic Hazardous Wastes

TestAmerica
ANALYTICAL TESTING CORPORATION

ANALYTICAL REPORT

POLLUTION PREVENTION CENTER 9583
PWBC ENV DIV. [redacted]
13 1/2 & INDIANA, BLDG. 2186
FT. CAMPBELL, KY 42223-5130

Project: S050321
Project Name: [redacted]
Sampler: [redacted]

Lab Number: 05-A40094
Sample ID: S050321 A/PAINT THINNER
Sample Type: Liquid waste
Site ID:

Date Collected:
Time Collected: 9:05
Date Received: 3/22/05
Time Received: 8:00

Analyte	Result	Units	Report Limit	Quan. Limit	Dil Factor	Date	Time	Analyst	Method	Batch
'GENERAL CHEMISTRY PARAMETERS'										
Flash Point, Closed Cup	FLASHED AT OR BELOW 80F					3/25/05	11:06	T. Beverly	1010	1341

TCLP Results

Analyte	Result	Units	Report Limit	Reg. Limit	Dil Factor	Date	Time	Analyst	Method	Batch
Arsenic, TCLP	ND	mg/l	1.00	5.0	1	3/24/05	14:19	C. Otero	6010B	8335
Barium, TCLP	ND	mg/l	1.00	100	1	3/24/05	14:19	C. Otero	6010B	8335
Cadmium, TCLP	ND	mg/l	1.00	1.0	1	3/24/05	14:19	C. Otero	6010B	8335
Chromium, TCLP	32.0	mg/l	0.500	5.0	1	3/24/05	14:19	C. Otero	6010B	8335
Lead, TCLP	ND	mg/l	1.00	5.0	1	3/24/05	14:19	C. Otero	6010B	8335
Mercury, TCLP	ND	mg/l	0.100	0.2	1	3/24/05	13:15	J. Hassan	7470A	8445
Selenium, TCLP	1.20	mg/l	0.100	1.0	1	3/24/05	14:19	C. Otero	6010B	8335
Silver, TCLP	ND	mg/l	1.00	5.0	1	3/24/05	14:19	C. Otero	6010B	8335
Benzene	1.10	mg/l	1.00	0.5	500	3/25/05	14:32	S. Udeze	8260	2441
Carbon tetrachloride	ND	mg/l	1.00	0.5	500	3/25/05	14:32	S. Udeze	8260	2441
Chlorobenzene	ND	mg/l	1.00	100	500	3/25/05	14:32	S. Udeze	8260	2441
Chloroform	ND	mg/l	1.00	6.0	500	3/25/05	14:32	S. Udeze	8260	2441
1,2-Dichloroethane	ND	mg/l	1.00	0.5	500	3/25/05	14:32	S. Udeze	8260	2441
1,1-Dichloroethene	ND	mg/l	1.00	0.7	500	3/25/05	14:32	S. Udeze	8260	2441
Methylethylketone	35000	mg/l	500	200	50000	3/26/05	17:51	S. Udeze	8260	2533
Tetrachloroethene	ND	mg/l	1.00	0.7	500	3/25/05	14:32	S. Udeze	8260	2441
Trichloroethene	ND	mg/l	1.00	0.5	500	3/25/05	14:32	S. Udeze	8260	2441
Vinyl Chloride	0.45	mg/l	1.00	0.2	500	3/26/05	14:32	S. Udeze	8260	2441

Sample report continued . . .

Chemical Analysis

TestAmerica
ANALYTICAL TESTING CORPORATION

ANALYTICAL REPORT

POLLUTION PREVENTION CENTER 9583
PWBC ENV DIV. [redacted]
13 1/2 & INDIANA, BLDG. 2186
FT. CAMPBELL, KY 42223-5130

Project: S050321
Project Name: [redacted]
Sampler: [redacted]

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Sample ID: S050321 A/PAINT THINNER (
Sample Type: Liquid waste
Site ID:

Date Collected:
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Characteristic Hazardous Wastes

TCLP Results

Analyte	Result	Units	Report Limit	Reg. Limit	Dil Factor	Date	Time	Analyst	Method	Batch
Arsenic, TCLP	ND	mg/l	1.00	5.0	1	3/24/05	14:19	C. Otero	6010B	8335
Barium, TCLP	ND	mg/l	1.00	100	1	3/24/05	14:19	C. Otero	6010B	8335
Cadmium, TCLP	ND	mg/l	1.00	1.0	1	3/24/05	14:19	C. Otero	6010B	8335
Chromium, TCLP	32.0	mg/l	0.500	5.0	1	3/24/05	14:19	C. Otero	6010B	8335
Lead, TCLP	ND	mg/l	1.00	5.0	1	3/24/05	14:19	C. Otero	6010B	8335
Mercury, TCLP	ND	mg/l	0.100	0.2	1	3/24/05	13:15	J. Hassan	7470A	8445
Selenium, TCLP	1.20	mg/l	0.800	1.0	1	3/24/05	14:19	C. Otero	6010B	8335
Silver, TCLP	ND	mg/l	1.00	5.0	1	3/24/05	14:19	C. Otero	6010B	8335
Benzene	1.10	mg/l	1.00	0.5	500	3/25/05	14:32	S. Udeze	8260	2441
Carbon tetrachloride	ND	mg/l	1.00	0.5	500	3/25/05	14:32	S. Udeze	8260	2441
Chlorobenzene	ND	mg/l	1.00	100	500	3/25/05	14:32	S. Udeze	8260	2441
Chloroform	ND	mg/l	1.00	6.0	500	3/25/05	14:32	S. Udeze	8260	2441
1,2-Dichloroethane	ND	mg/l	1.00	0.5	500	3/25/05	14:32	S. Udeze	8260	2441
1,1-Dichloroethene	ND	mg/l	1.00	0.7	500	3/25/05	14:32	S. Udeze	8260	2441
Methylethylketone	35000	mg/l	500	200	50000	3/26/05	17:51	S. Udeze	8260	2535
Tetrachloroethene	ND	mg/l	1.00	0.7	500	3/25/05	14:32	S. Udeze	8260	2441
Trichloroethene	ND	mg/l	1.00	0.5	500	3/25/05	14:32	S. Udeze	8260	2441
Vinyl Chloride	9.45	mg/l	1.00	0.2	500	3/26/05	14:32	S. Udeze	8260	2441

D007
D010
D018
D035
D043

HAZARDOUS WASTE DETERMINATIO

Is it a Characteristic Hazardous Waste

Characteristic Hazardous Waste Examples

Acetic Acid	D001, D002 (ignitable, corrosive)
Antifreeze Sludge	D008, D010 (lead, selenium)
Waste Hydraulic Absorbent	D006 (cadmium)
Corrosion Remover Compound	D002 (phosphoric acid)
Waste Mogas	D001, D018 (benzene)
Waste Insecticide	D001, D013 (ignitable, lindane)
Waste parts washer solvent	D006, D008, D010

HAZARDOUS WASTE DETERMINATIO

Is it OK to mix a non-hazardous waste with a hazardous waste in order to dilute it and make the mixture non-hazardous (without a permit)?

No !

In general, mixing a non-hazardous solid waste with a listed hazardous waste makes the entire mixture a hazardous waste.

Mixing hazardous waste with non-hazardous waste to render it non-hazardous is a treatment method

Emergen
Procedur
&
Preventio

Hazardou
Substanc
Spills

HAZARDOUS SUBSTANCE SPILLS

POSSIBLE AREAS OF CONCERN

Hazardous substances, when spilled, pose a risk to individuals and the environment.

CHARACTERIZATION

Many hazardous materials and substances are used in the daily operation of the installation pose physical, health and environmental hazards.

HANDLING PROCEDURES

Step 1 Materials Safety Data Sheets (MSDS) should be maintained on all hazardous materials.

Step 2 Employees should be familiar with, and trained on, the potential hazards of chemicals in the workplace, coordinating with **Installation Safety Office** (Hazcom CAM Reg 385-6) for training requirements.

Step 3 If spills occur with chemicals that are not routinely used, or if employees are not trained and equipped with proper spill clean up materials, 911 should be called.

Step 4 If there is a question about clean up and reporting, contact **Environmental Division Spill/Storage Tank Program** for guidance.

NOTE: Mercury spills of any quantity must be reported to 911.

Hazardous substances, including mercury

GENERAL INFORMATION

The following information should be relayed when reporting a spill: Name/Phone/Unit of individual reporting the spill; location of spill; name and amount of spilled material; rate currently spilling; extent of spill, including drainage features; injuries, if any; time spill occurred, and any additional information.

Spill materials for specific chemicals may be obtained from the **PPOC Services**.

For POL and Fuel Spills see protocol sheet A-36.

ENV
HB
Page

Know the
Potential
Hazards

If Not
Trained
and
Equipped

Call 911

Satellite Accumulation Point Operations

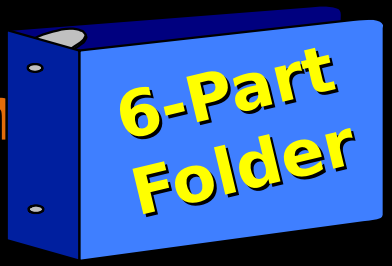
SAP Operator Training – Module Three

Hazardous Waste

Cradle-to-Grave Management

Six Part Folder

Satellite Accumulation Point Operations



Documentation of Cradle-to-Grave Management

Record Keeping (40 CFR Part 262.40): Show the regulator what unit/activity generated the hazardous waste and when it was turned-in to the 90-Yard for final disposition. Generators within the 101st Airborne Division (AASLT) will utilize the Waste Turn-In Log. Tenant unit/activity will utilize a DD Form 1348-1a as proof of turn-in or chain-of-custody of the hazardous waste.

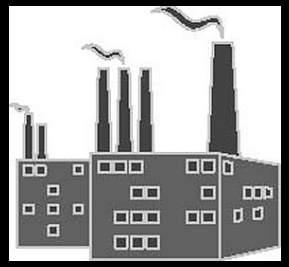
The hazardous waste program manager will keep a copy of each manifest signed for three years from the date the waste was accepted by the initial transporter to the Treatment, Storage, or Disposal Facility (TSDF).

Fort Campbell

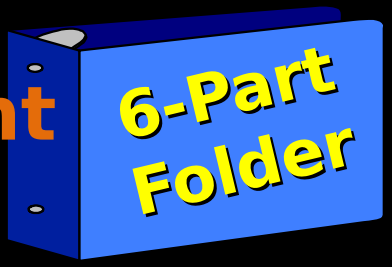
Hazardous Waste 90-Day Yard

Transporter

TSDF



Satellite Accumulation Point Operations



PART I

Site Certification and Admin

Commander/Director Memo
Site Specific Drawing
HW Program Manager Memo
EQO Certificate
HW Operator Certificate
Operators Training Roster
Deployment Memos (Military)

PART II

FTCKY Hazmat Inventory Form

List the products and waste managed at the SAP

PART III

Product Material Safety Data Sheets (MSDS's)

Insure there are no compatibility issues at the site

PART IV

Waste Profiles

Generator knowledge or analysis of process wastes to ensure proper manifesting to the Treatment, Storage and Disposal Facility (TSDF)

PART V

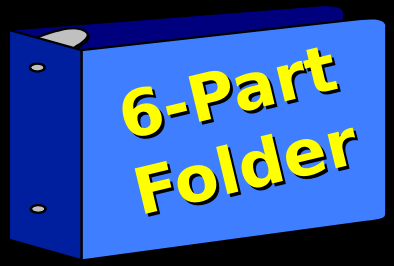
Site Inspections *(On file for three years)*

Weekly operator inspections, monthly environmental division inspection, and regulatory inspections

PART VI

Chain of Custody/Waste Turn-In Log

Utilize chain of custody turn-in log or
DD Form 1348-1a for turn-in of hazardous waste.



PART I

Site Certification and Admin

Commander/Director Memo
Site Specific Drawing
HW Program Manager Memo
EQO Certificate
HW Operator Certificate
Operators Training Roster
Deployment Memos (Military)

Commander/ Director Memo

DEPARTMENT OF THE ARMY

_____

_____

Fort Campbell, Kentucky 42223

AFZB-_____ _____
Date

MEMORANDUM FOR the Environmental Division, Pollution Prevention Branch

SUBJECT: Request Certification/Recertification of a Satellite Accumulation Point (SAP)

1. Request establishment or re-establishment of a SAP for the following wastes: _____.

2. The estimated date of installation should be _____.

3. This SAP site will be established at building _____ located near the intersection of _____ in room _____.

4. The SAP at this location will be maintained and managed IAW applicable regulations. When waste containers are filled, the PPOC at 2nd and Wickham Avenue will be notified for waste pick-up (798.9790). Any deployment over 10 days will require closure of the above site. Questions should be brought to the Environmental Division's Pollution Prevention Branch (798.9763/9105).

5. The Environmental Quality Officer (EQO) is _____ and can be contacted at phone number _____.

6. The point of contact for this memorandum is _____ and can be contacted at phone number _____.

_____

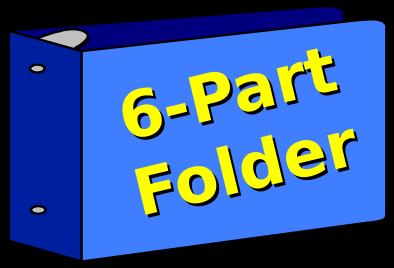
_____

Commanding

_____

_____

Environmental Quality Officer



PART I

Site Certification and Admin

- Commander/Director Memo
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- EQO Certificate
- HW Operator Certificate
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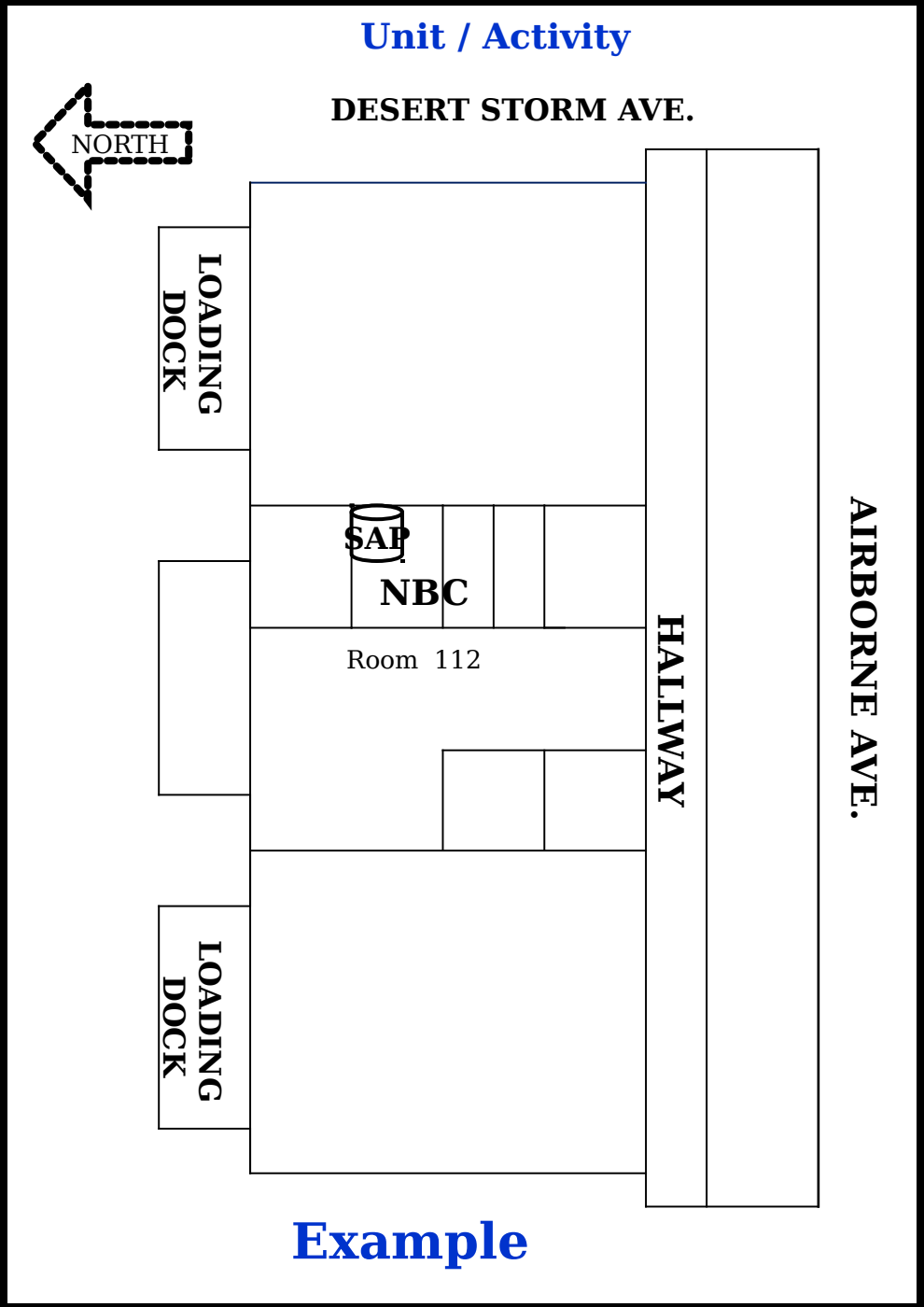
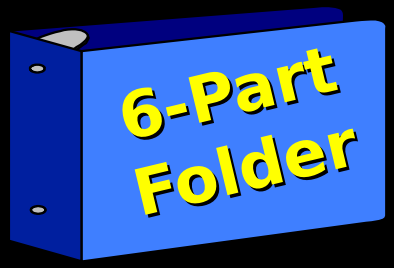
- Deployment Memos (Military)

Site Specific Drawing



Example



PART I

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Operators Training Roster
Deployment Memos (Military)

HW Program Manager Memo

AFZB-PW-E-P

APPROVED: 07 June 2010
EXPIRES: 07 June 2011

MEMORANDUM FOR Commander, HHC, 5-101 Aviation Battalion, 101st Airborne Division (Air Assault), ATTN: CPT John Waste, SSG Adam R. Quality and Bob O. Lamps.

SUBJECT: Satellite Accumulation Point (SAP) Certification

1. **HHC, 5-101 AVN BN** generates the following hazardous/universal waste streams: **C2/C2A1 mask filters and M256/M258/M291/M295 NBC kits. Used batteries (lithium, mercury, magnesium) will be stored at the 5-101 AVN BN commo shop.**

2. **HHC, 5-101 AVN BN** is granted approval to maintain the SAP in the **CBRN Room in Building 7133**. A site-specific contingency plan drawing and six-part folder must reflect these waste streams. The SAP may be inspected for compliance by the Environmental Division and is subject to federal and state regulations.

3. This SAP accumulation status must be re-certified annually. A request must be sent to the Environmental Division concerning any changes to the SAP's location or to the waste streams being accumulated.

4. The SAP will be established as follows:

a. The SAP will be at or near the point of generation and under control of the operator of the process generating the waste.

b. Accumulation of waste at the SAP must not exceed 55 gallons of hazardous waste or 1 quart of acute (toxic) hazardous waste.

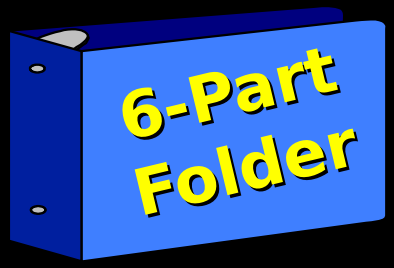
c. Each waste container must be properly labeled, by clearly marking the container with the words "Hazardous Waste" or "Universal Waste" whichever applies along with the name of the waste or hazardous constituents in the waste stream. Universal waste containers (e.g., lithium batteries) must be properly labeled "Universal Waste" and dated the day the first item is placed in the container.

d. Waste containers must only be used for the intended purpose and maintained in good physical condition and kept closed at all times except when adding or removing waste.

e. A six-part folder will be maintained for the SAP in accordance with the Fort Campbell Environmental Handbook, Section 6.

5. Point of contact is Daniel N. Hixson, PWBC, Environmental Division, Pollution Prevention, and telephone: 798-9763. E-mail: dan.hixson@us.army.mil.

BILL BAGGETT
Hazardous Waste Program Manager
Pollution Prevention Branch



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PART I

Site Certification and Admin

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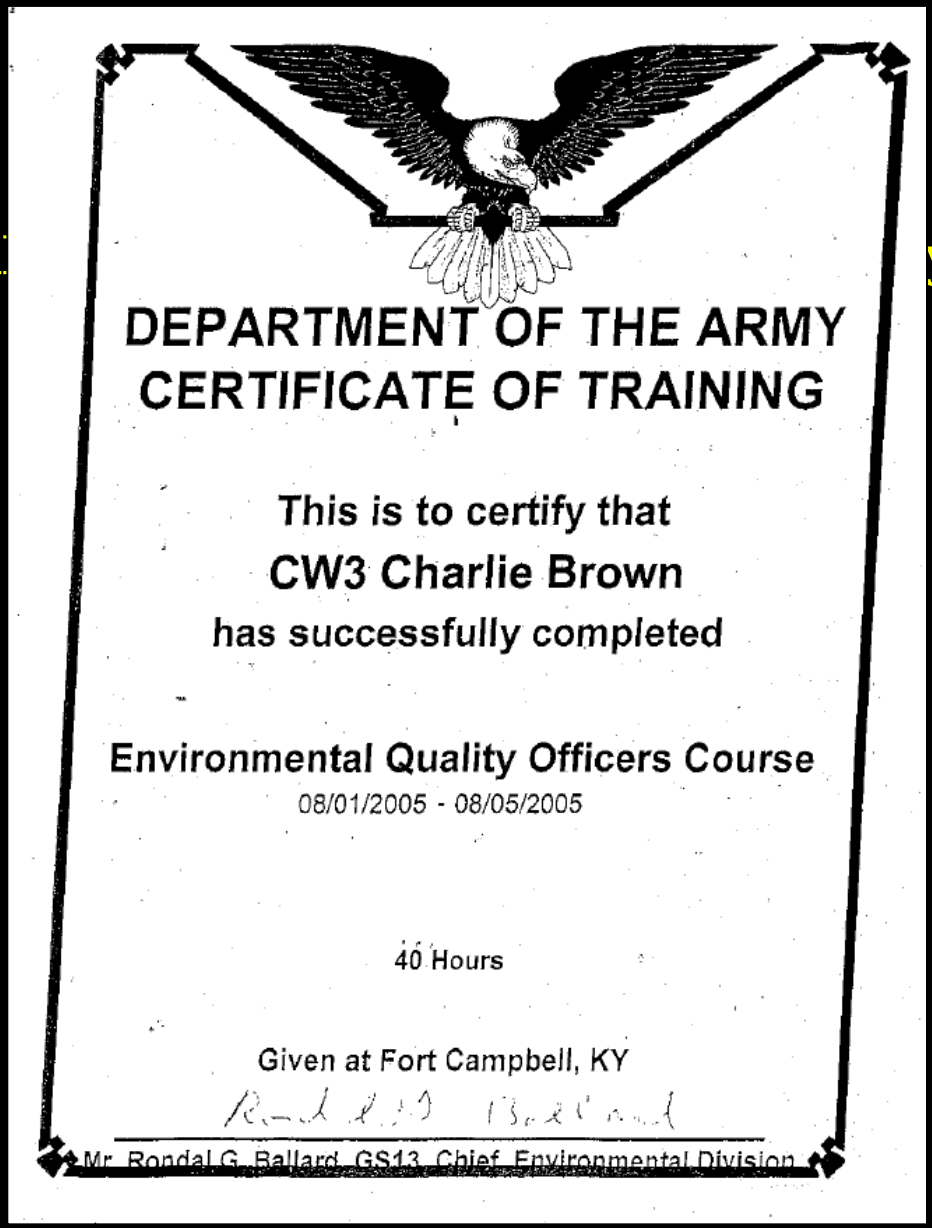
- HW Operator Certificate
- Operators Training Roster
- Deployment Memos (Military)

Training Certificates

- EQO
- SAP Operator(s)



DEPARTMENT OF THE ARMY
CERTIFICATE OF TRAINING

This is to certify that
CW3 Charlie Brown
has successfully completed

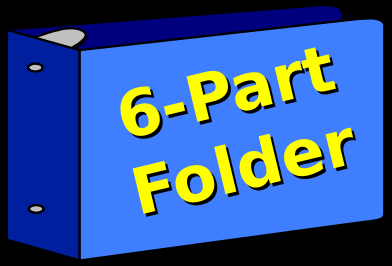
Environmental Quality Officers Course
08/01/2005 - 08/05/2005

40 Hours

Given at Fort Campbell, KY

Mr. Rondal G. Ballard, GS13, Chief, Environmental Division

SAP Training is Required Annually For HW Operators



PART I

Site Certification and Admin

- Commander/Director Memo
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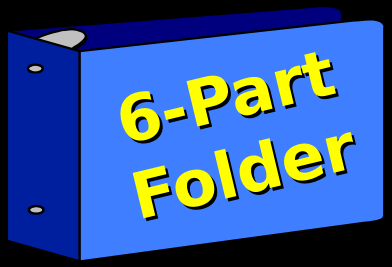
- Deployment Memos (Military)

Training Certificates

- EQO
- SAP Operator(s)

SAP Training is Required Annually For HW Operators



PART I

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Deployment Memos (Military)

SAP Operator's Training Roster

This training is good for 30 days. Beyond this date, the SAP Operator Course is required.

SAP OPERATORS TRAINING ROSTER

UNIT: _____ TRAINED BY: _____

The following personnel have received "Operator Level" training and understand the regulatory requirements to maintain environmental compliance within a Satellite Accumulation Point (SAP):

	NAME (PLEASE PRINT)	RANK	DATE
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
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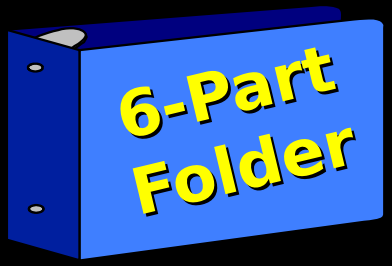
25.			



PART I

Site Certification and Admin

Commander/Director Memo
Site Specific Drawing
HW Program Manager Memo
EQO Certificate
HW Operator Certificate
Operators Training Roster
Deployment Memos (Military)

Deployment Memo's (Military Units)

DEPLOYMENT and Rear Detachment INSTRUCTIONS FOR HAZARDOUS WASTE & POL COMPLIANCE

Environmental Quality Officers (EQO's) are to be maintained by Unit Rear Detachments, and continued compliance of all environmental issues is required.

SATELLITE ACCUMULATION POINT PROCEDURES

1. Coordinate with the unit Environmental Quality Officer (EQO) to ensure regulatory compliance with hazardous waste requirements. If no EQO is appointed, contact Environmental Division Environmental Education Training Program (270-798-9771/9595).
2. SAP Closure. If all unit CBRN (NBC) assets are deployed, close the Satellite Accumulation Point (SAP).
   a. Submit a SAP closure memo signed by the Commander and EQO to the Environmental Division (798-9763).
   b. Turn in hazardous waste to the 90-Day Yard located at 2nd and Wickham (798-9790).
   c. Place a copy of the SAP closure memo on the outside of the CBRN (NBC) room door.
   d. Keep the SAP Poster, 6-Part Folder, and the empty accumulation containers for use when the unit returns to Fort Campbell.
3. If the SAP remains OPEN. If the SAP is needed to manage CBRN waste generated by rear detachment personnel, keep the SAP open and ensure a SAP Operator is appointed and trained (798-9763). Comply with the requirements listed on the SAP Poster and ensure weekly SAP inspections are documented by the SAP Operator.

PETROLEUM, OILS & LUBRICANTS (POL) ACCUMULATION POINTS

1. Coordinate with the unit Environmental Quality Officer (EQO) to ensure regulatory compliance. If no EQO is appointed, contact Environmental Division Environmental Education Training Program (798-9761/9595).
2. Commanders may authorize Reserve or National Guard units the use of the POL Accumulation Point in lieu of closure. Coordinate transfer of management of the POL point with Environmental Division Hazardous Waste (798-9763/9786).
3. POL Accumulation Point Closure. If all vehicles and generators are deployed and there is no need to accumulate POL products, close the POL accumulation point.
   a. Submit a POL Accumulation Point closure memo signed by the Commander and EQO to the Environmental Division (798-9763).
   b. Call 798-9790 to have the Used Oil and Used Antifreeze removed from accumulation drums.
   c. Secure POL secondary containment units (SCU) until the unit returns to Fort Campbell or coordinate turn-in. Serviceable SCUs - PPOC (798-9790). Unserviceable SCUs - DRMO (798-3525).
4. If the POL Site remains OPEN. If the POL Site is needed to manage POL generated by rear detachment, keep the site open. Comply with the requirements listed on the POL Accumulation Point Poster and ensure weekly inspections are documented.

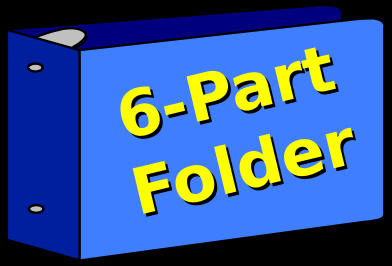
Satellite Accumulation Point

How to Close a SAP

ENV HB Page

If all CBRN (NBC) assets are deployed, close the Satellite Accumulation Point (SAP).

1. Submit a SAP closure memo signed by the Commander and EQO to the Environmental Division (798-9763).
2. Turn in Hazardous Waste to the 90-Day Yard located at 2nd and Wickham (798-9790).
3. Place a copy of the SAP closure memo outside the CBRN (NBC) room door.
4. Keep the SAP poster, 6-Part Folder, and empty accumulation containers for use when the unit returns to Fort Campbell.



PART I

Site Certification and Admin

Commander/Director Memo
Site Specific Drawing
HW Program Manager Memo
EQO Certificate
HW Operator Certificate
Operators Training Roster
Deployment Memos (Military)

Deployment Memo's (Military Units)

DEPARTMENT OF THE ARMY

_____

_____

Fort Campbell, KY 42223

AFZB-_____ _____
(date)

MEMORANDUM FOR The Environmental Division's Pollution Prevention Branch

SUBJECT: Request Temporary Closure of Satellite Accumulation Point

1. Request temporary closure status due to deployment or training that is over a 10 day period.

2. The estimated date of departure is _____ and date of return is _____.

3. The SAP site to be temporarily closed is established at Building _____ located near the intersection of _____ in room _____.

4. All the approved waste streams on-hand are _____ and have been turned into the PPOC and annotated on the waste turn-in log.

The SAP at this location has now been emptied of all waste (waste pick-up, 798-9790) and no waste may be accumulated until approved by the Environmental Division's Pollution Prevention Branch. (798-9763/9105).

5. Upon return this site acknowledges that no waste will be accumulated until a call has been made to the Environmental Division's Pollution Prevention Branch to request that the SAP be opened.

6. The Environmental Quality Officer (EQO) is _____ and can be contacted at (phone #) _____.

7. The POC for this memorandum is _____ and can be contacted at (phone #) _____.

_____

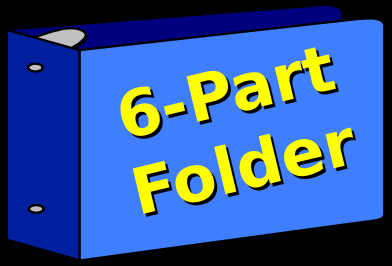
_____

Commanding

_____

_____

Environmental Quality Officer



PART II

FTCKY Hazmat Inventory Form

Products and waste managed at the SAP

FTCKY HAZMAT INVENTORY FORM

Ft. Campbell Environmental Division Pollution Prevention Branch/ 798-3105

Date: ____/____/____ Page ____ of ____

Unit (Bde, Bn, Co): _____ Bldg #: _____ State: _____ POC: _____ Phone #: _____

Bldg Description: _____ HazMat Storage Location: _____
(i.e. motor pool, aviation hangar, office building, etc.) (i.e. flammable wall locker, supply closet, etc.)

NSN (If unknown, attach MSDS)	Manufacturer Name	Material Name	Material Use (i.e. Intermediate/Depot Level Maintenance, Weapons Cleaning, Etc.)	Disposal Procedure (i.e. Consumed, DPW, DRMO, Recycled, Etc.)	Maximum # Containers Kept On Hand	Weight/Volume Per Container (i.e. 1 qt, 5 gl, 16 oz, 1 ea, etc.)	Cntrs Used Per Month (Approx.)
Example: 6810-00-281-2785	*CSD INC.*	*MEK*	*Degreaser*	*Turned in for HazWaste Disposal*	*1 Can*	*1 Gal.*	*1*

Note: The above information is requested in compliance with Executive Order 12856 and the Emergency Planning and Community Right-To-Know Act. Please provide complete and accurate information for each product listed on this form. **Updated 9/98**

Hazmat Inventory

FTCKY HAZMAT INVENTORY FORM

Ft. Campbell Environmental Division Pollution Prevention Branch/ 798-3105

Date: 09/10/10

Unit (Bde, Bn, Co): A-7-101 AVN Bldg #: 7218 State: KY POC: SSG John Phone #: _____

Bldg Description: Aviation Hangar (i.e. motor pool, aviation hangar, office building, etc.)

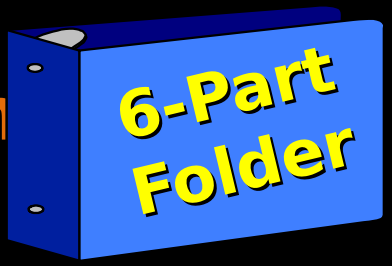
HazMat Storage Location: Hazmat Return Locker (i.e. flammable wall locker, supply closet, etc.)

NSN (If unknown, attach MSDS)	Manufacturer Name	Material Name	Material Use (i.e. Intermediate/Depot Level Maintenance, Weapons Cleaning, Etc.)	Disposal Procedure (i.e. Consumed, DPW, DRMO, Recycled, Etc.)	Maximum # Containers Kept On Hand	Weight/Volume Per Container (i.e. 1 qt, 5 gl, 16 oz, 1 ea, etc.)	Cntrs Used Per Month (Approx.)
Example: 6810-00-281-2785	*CSD INC.*	*MEK*	*Degreaser*	*Turned in for HazWaste Disposal*	*1 Can*	*1 Gal.*	*1*
4240-01-361-1319	3M	C2A1 Canister	CBRN Defense	Turned in for HW Disposal	50	1 ea.	5

Note: The above information is requested in compliance with Executive Order 12856 and the Emergency Planning and Community Right-To-Know Act. Please provide complete and accurate information for each product listed on this form.

Updated 9/98

Satellite Accumulation Point Operations

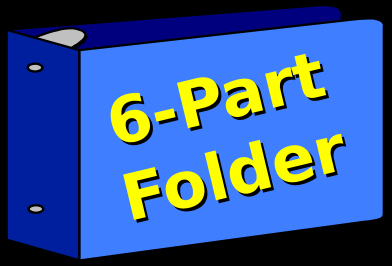


PART III

Product Material Safety Data Sheets (MSDS's)

Insure there are no compatibility issues at the site

- MSDS Safety Information
- Item Description Information
- Ingredients
- Health Hazards Data
- Handling and Disposal
- ire & Explosive Hazard Informatio
- Control Measures
- hysical and Chemical Propertie
- Reactivity Data
- Ecological Information
- Transportation Information



PART IV

Waste Profiles

Generator knowledge or analysis of process wastes to ensure proper manifesting to the Treatment, Storage and Disposal Facility (TSDF)

RESET PRINT

HAZARDOUS WASTE PROFILE SHEET

NOTE: Explosives, Shock Sensitive, Pyrophoric, Radioactive, and Etiological Waste are not normally accepted by the DRMO
Contact your DRMO for further guidance if your waste meets any of these categories.

PART I

A. GENERAL INFORMATION

1. GENERATORS NAME: Fort Campbell, Ky

WASTE PROFILE NO. 987

2. FACILITY ADDRESS
HQ, 101st AIRBORNE (ASSLT) DIVISION & FT. CAMPBELL
IMSE-PW-E
FORT CAMPBELL, KY.

3. ZIP CODE: 42223

4. GENERATOR USEPA ID: TN5210020140

5. GENERATOR STATE ID

6. TECHNICAL CONTACT: BILL BAGGETT

7. TITLE: ENV. PROTEC. SPEC.

8. PHONE: 270-798-9786

B. WASTE INFORMATION

1. NAME OF WASTE: ACETYLENE CYLINDERS

2A. USEPA WASTE CODE: D001 (FLAMMABLE GAS)

2B. STATE/LOCAL/HOST-NATION WASTE CODES:

3. PROCESS GENERATING WASTE: SUPPLY TURN-IN

4. PROJECTED ANNUAL VOL: 10-50

5. MODE OF COLLECTION: CYLINDER

6. IS THIS WASTE A DIOXIN LISTED WASTE AS DEFINED IN 40 CFR 261.31? ☐ YES ☐ NO

7. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL? *(40 CFR 268)* ☒ YES ☐ NO
HAS AN EXEMPTION BEEN GRANTED? ☐ YES ☒ NO
DOES THE WASTE MEET APPLICABLE TREATMENT STANDARDS ALREADY? ☐ YES ☒ NO
(If Yes, Enter Reference Standards in Part II, Block 8)

PART II

1. MATERIAL CHARACTERIZATION *(Optional - Not Required Data)*

COLOR	DENSITY	BTU/LB
TOTAL SOLIDS	ASH CONTENT	

LAYERING: ☐ MULTILAYERED ☐ BILAYERED ☐ SINGLE PHASE

2. RCRA CHARACTERISTICS

PHYSICAL STATE (Check One): ☐ SOLID ☐ LIQUID ☐ SEMI-SOLID ☒ GAS ☐ OTHER _____

OTHER CHARACTERISTICS (Check all that apply)

☒ IGNITABLE ☐ CORROSIVE (D002) ☐ REACTIVE (D003) ☐ WATER REACTIVE ☐ CYANIDE REACTIVE ☐ SULFIDE REACTIVE

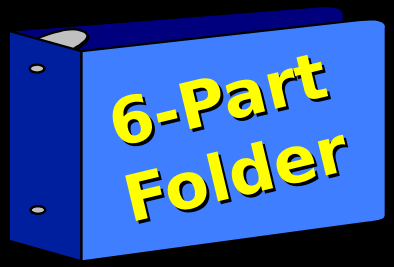
Flash Point _____ *pH* _____

☐ HIGH TOC (≥10%) ☐ LOW TOC (<10%) TREATMENT GROUP: ☐ WASTEWATER ☐ NONWASTEWATER

3. CHEMICAL/MATERIAL COMPOSITION *(List all components and contaminents, including PCB's, and any applicable F-Listed and Underlying Hazardous Constituents)*

CAS #	COMPONENT *(Be as descriptive as possible. Chemical names, as well as generic descriptions, e.g., "sludge", "paint solids", "water" etc. are acceptable.)*	CONCENTRATION	RANGE
74-86-2	ACETYLENE	100%	

DRMS FORM 1930, Oct 2006 (EF)



PART IV

Waste Profiles

Generator knowledge or analysis of process wastes to ensure proper manifesting to the Treatment, Storage and Disposal Facility (TSDF)

HAZARDOUS WASTE PROFILE SHEET *(Continued)* — WASTE PROFILE NO. 987

3. MATERIAL COMPOSITION / UNDERLYING HAZARDOUS CONSTITUENTS

CAS #	COMPONENT *(Be as descriptive as possible. Chemical names, as well as generic descriptions, e.g., sludge, 'paint solids', 'water' etc. are acceptable.)*	CONCENTRATION	RANGE

RANGE TOTAL MUST EQUAL AT LEAST 100%

4. SHIPPING INFORMATION

DOT HAZARDOUS MATERIAL? [X] YES [ ] NO *(If "NO" skip to block 5)*

PROPER SHIPPING NAME: Waste acetylene, dissolved

HAZARD CLASS 2.1	U.N. or N.A. NO. UN 1001	PACKING GROUP N/A

ADDITIONAL DESCRIPTION

METHOD OF SHIPMENT [ ] BULK [ ] DRUM [X] OTHER

DOT REPORTABLE QTY *(RQ)* N/A

EMERGENCY RESPONSE GUIDE EDITION *(YR)* 2008	EMERGENCY RESPONSE NUMBER 116

5. SPECIAL HANDLING INFORMATION

6. GENERATOR CERTIFICATION

[ ] CHEMICAL ANALYSIS *(ATTACH TEST RESULTS)* [X] USER KNOWLEDGE *(ATTACH SUPPORTING DOCUMENTS)*

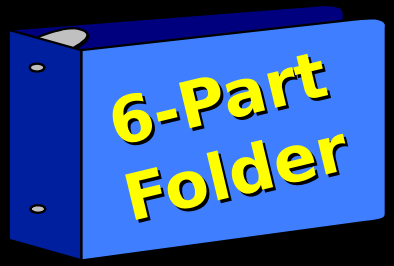
EXPLAIN HOW AND WHY THESE DOCUMENTS COMPLY WITH RCRA REQUIRMENTS

CERTIFICATION

I, BILL BAGGETT HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS TO THE BEST OF MY KNOWLEDGE AN ACCURATE REPRESENTATION OF THE WASTE TURNED IN TO THE DRMO. ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

Signature of Generator's Representative — *Date* 7-30-09

DRMS FORM 1930, Oct 2005 (EF)



PART V

Site Inspections *(On file for three years)*

Weekly operator inspections, monthly environmental division Inspection, and regulatory inspections

SATELLITE ACCUMULATION POINT WEEKLY INSPECTION SHEET

Inspection Requirements

1. Are containers in good condition/not leaking?
2. Are containers compatible with waste stored?
3. Are containers closed except when adding and removing waste?
4. Are containers marked "Hazardous Waste" and other words that identify the contents?
5. Is HW at or near the point of generation? Under the operator's control?
6. Are all containers dated (piece of tape) when they become full?
7. Does liquid waste have secondary containment?
8. Does the six-part folder have all the proper documentation?
9. Is the SAP identified with a sign?
10. Is there a fire extinguisher (UW)? Is it inspected every 30 days?

NOTE: List each deficiency found on a single line. Annotate results even if no deficiencies were found in the "Deficiency" block.

Date	Print Inspector' Name	Deficiency	Corrective action taken	Date & Initial

SATELLITE ACCUMULATION POINT WEEKLY INSPECTION SHEET

Inspection Requirements

1. Are containers in good condition/not leaking?
2. Are containers compatible with waste stored?
3. Are containers closed except when adding and removing waste?
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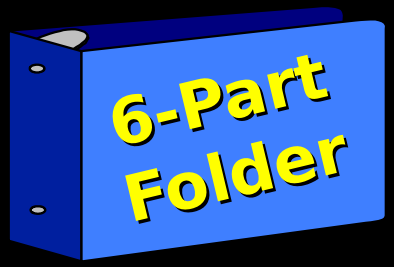
7. Does liquid waste have secondary containment?
8. Does the six-part folder have all the proper documentation?
9. Is the SAP identified with a sign?
10. Is there a fire extinguisher (UW)? Is it inspected every 30 days?

NOTE: List each deficiency found on a single line. Annotate results even if no deficiencies were found in the "Deficiency" block.

Date	Print Inspector' Name	Deficiency	Corrective action taken	Date & Initial
9/20/09	Your Name	Container lid was not closed	Closed lid (retrained person	



PART V

Site Inspections *(On file for three years)*

Weekly operator inspections, monthly environmental division inspection, and regulatory inspections

RCRA SATELLITE ACCUMULATION POINT INSPECTION CHECKLIST

UNIT: _____ INSPECTOR: MSG John E. Tuttle
SSG Neville M. Watkins
Daniel N. Hixson

HW ONSITE: *HAZARDOUS WASTE* *NON-RCRA WASTE* *UNIVERSAL WASTE* _____ INSPECTOR'S SIGNATURE

INSPECTION DATE: _____ PHONE: 270-798-9763/9105

BLDG. #: _____ NEXT SAP CLASS: _____ NEXT EQO CLASS: _____

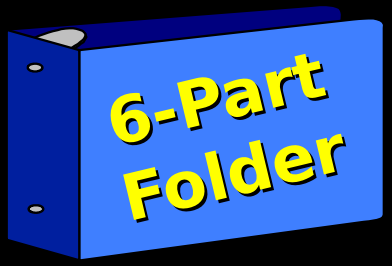
RCRA COMPLIANCE (Class I Finding)	YES	NO	REMARKS / CORRECTIVE ACTION	ERC
Generator is not accumulating over 55 gallons of hazardous waste or one quart of acutely hazardous waste on-site.[40 CFR §262.34(c)(1)] HW.75.1.US.			*UW has no gallon or pound limit.*	TT01 CM04
Hazardous waste containers are at or near any point of generation where wastes initially accumulate.[40 CFR §262.34(c)(1)] HW.75.1.US.				TT01 CM04
Hazardous waste is under the control of the operator of the process generating the waste.[40 CFR §262.34(c)(1)] HW.75.1.US.				TT01 CM04
Container must be in good condition / not leaking.[40 CFR §262.34(c)(1)(i) and §265.171] HW.75.1.US.				TT01 CM04
Container must be compatible with waste storage.[40 CFR §262.34(c)(1)(i) and §265.172] HW.75.1.US.			Damaged container: Yes No	TT01 CM04
Container must be closed except when necessary to add or remove waste. [40 CFR §262.34(c)(1)(i) and §265.173(a)] HW.75.1.US.			Open container: Yes No	TT01 CM04
Marks container either with the words "Hazardous Waste" and other words that identify the contents of the containers.[40 CFR §262.34(c)(1)(ii)] HW.75.1.US.			Improper label No label	TT01 CM04
INTERNAL ACTIVITY/UNIT CHECKS	**YES**	**NO**	**REMARKS**	
Do container(s) accumulating hazardous. *liquid* waste have adequate secondary containment to prevent waste from entering the environment? (BMP)				
Has the SAP site been established and managed properly? (BMP)				
Has an EQO been assigned via orders to your unit? (BMP)			EQO Name/Phone #: _____	
Area identified with SAP compliance poster? (BMP)				
Fire extinguisher available (sealed, inspected every 30 days, certified annually / gauge is in the green). Required for Universal Waste Sites only.				
Is the operator familiar with the process that generates the hazardous waste(s)?				

HELPFUL NUMBERS	UNIT / ACTIVITY SITE REPRESENTATIVE
Environmental Training: Bob Fletcher, 798-9595 Command Safety: 798-6789/2327 Preventive Medicine: 798-8695 Haz Waste Program Manager: Bill Baggett, 798-9786 Haz Waste / POL Support: Dan Hixson, 798-9763 Special Duty NCO(s): 798-9783/9105	PRINTED NAME: _____ PHONE NUMBER: _____ SIGNATURE: _____

FOR HAZARDOUS WASTE PICK-UP CALL 270-798-9790

CBRN WASTE: CALL 270-798-9790 FOR APPT.--TAKE WASTE TO PPOC AT 2ND STREET AND WICKHAM AVENUE.

A 55 GALLON LIMIT ON EACH HAZARDOUS WASTE SAP - 1 QUART LIMIT ON ACUTE HAZARDOUS WASTE.



PART VI

Chain of Custody/Waste Turn-In Log

Utilize chain of custody turn-in log or
DD Form 1348-1a for turn-in of hazardous waste.

PWBC-Environmental Division Hazardous/Universal Waste Turn-In Log

Fill Date	Approved Waste Stream	Quantity	Received By	Date Received

Note: The PPOC may require some activities to fill out a DD Form 1348-1A.

PART VI

Chain of Custody/Waste Turn-In Log

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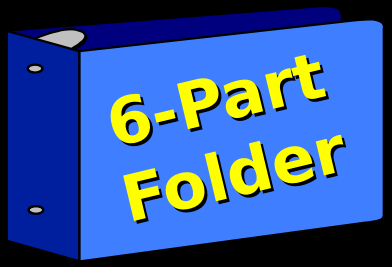
PWBC-Environmental Division Hazardous/Universal Waste Turn-In Log

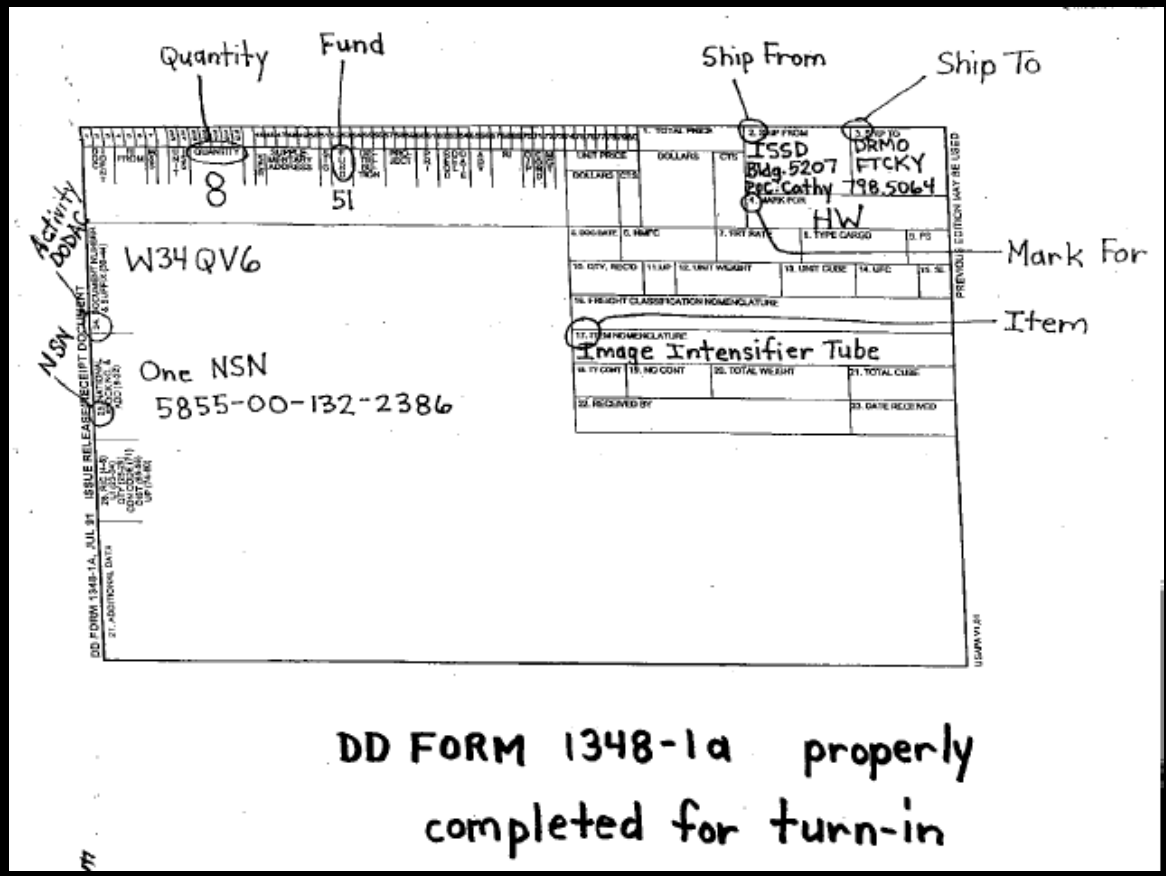
Fill Date	Approved Waste Stream	Quantity	Received By	Date Received
6 APR 10	M256 Chemical Detector Kit	5 GL	Signature	6 APR 10

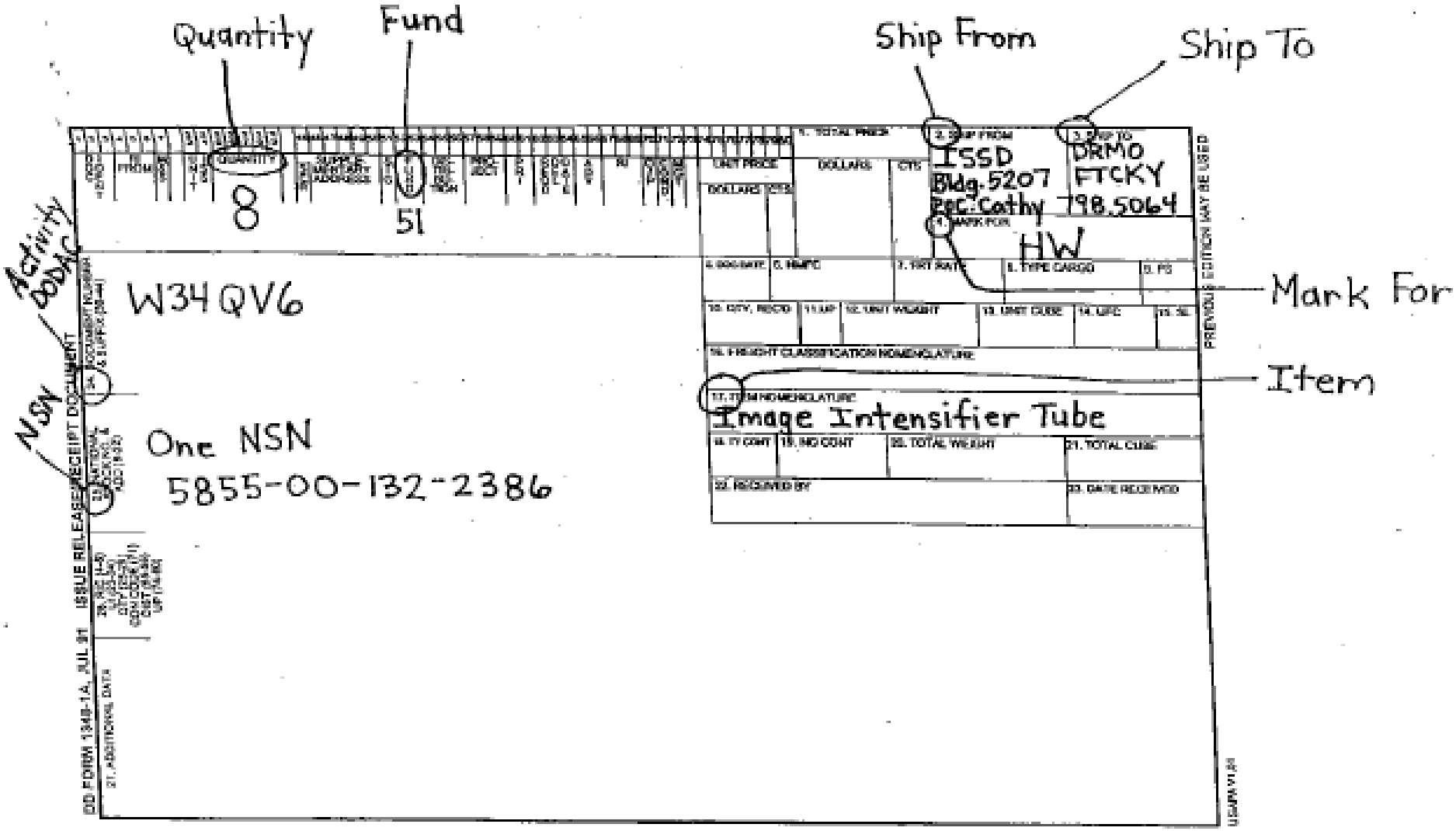


PART VI

Chain of Custody/Waste Turn-In Log

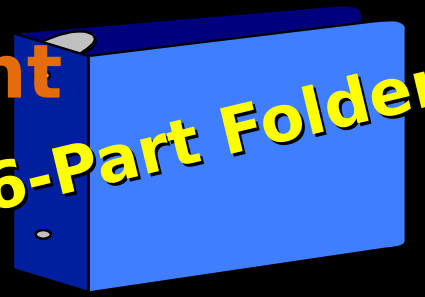
Utilize chain of custody turn-in Log or
DD Form 1348-1a for turn-in of Hazardous waste.





DD FORM 1348-1a properly completed for turn-in

Satellite Accumulation Point Operations



PART VI

Chain of Custody/Waste Turn-In Log

Utilize chain of custody turn-in log or
DD Form 1348-1a for turn-in of hazardous waste.

Who fills out the DD Form 1348-1a?

Military units: MEDDAC/DENTAC-BACH, Veterinarian, and all dental clinics.

Government Services: ALMD, ESRA, IMD, and ITO.

Contractors: DYNCORP, J&J Maintenance, and any other outside contractor.

** There may be special occasions when any unit or activity may be requested to provide a completed DD form 1348-1a.

Satellite Accumulation Point Operations

SAP Operator Training – Module Four

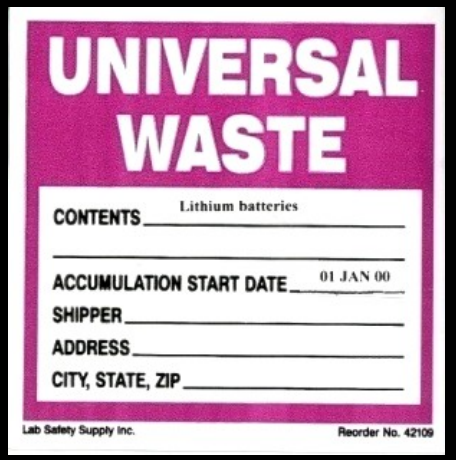
Universal Waste Management

Fluorescent Lamps

Used Batteries

Best Management Practices

Universal Waste Site Operations



What is Universal Waste?

Common hazardous wastes such as batteries, recalled or discontinued pesticides, mercury containing items (thermostat ampoules, mercury switches, thermometers, etc), and mercury containing lamps that are generated, stored and recycled or reclaimed off-site.

Universal waste can be accumulate for up to one year from the date the waste was generated by the unit / activity.

Mercury containing lamps are accumulated as universal waste to prevent mercury from entering the environment. BMP require universal waste lamps to be turned in within 6 months at established locations

Label Container
Universal Waste Lamp

Date the container
with the date
the first used lamp is
placed in the contain

Keep Container Close
Unless
Adding or Removing
Waste Lamps

FLUORESCENT TUBES and MERCURY-CONTAINING LAMPS

POSSIBLE AREAS OF CONCERN

Small quantities of mercury, antimony, cadmium, barium, and lead are used to manufacture fluorescent bulbs and mercury vapor lamps, metal halide and high pressure sodium lamps.

CHARACTERIZATION

All used lamps including fluorescent bulbs and mercury-containing lamps are **universal wastes**.

CONTAINER MARKING AND HANDLING PROCEDURES

Step 1 Place used fluorescent tubes in the original container or shipping box provided. Box must be able to be closed (do not cut end out of box).

Step 2 a. Label the box with "Universal Waste Lamps".

b. Date the box with the date the first used lamp is put in the box/container (used bulbs should not be maintained in area longer than 6 mos).

Step 3 Always close container after adding bulb/lamp.

Step 4 Transport used bulbs in a sturdy box to the appropriate consolidation points for your unit/activity:

NOTE: Broken tubes/bulbs should be swept up, bagged/containerized (BMP) and taken to **Troop Self Help**. If a lamp is broken off at the end and is too large to bag, place the lamp inside the Universal Waste fluorescent lamps box and take it to Troop Self Help.

- Troop Self Help, Bldg 863, Bastogne Ave & 14th St.
- AAFES Main Exchange (for AAFES facilities only), Bldg 2840, Bastogne Ave
- 160th SOAR Boeing Sikorsky, Bldg 7281
- Blanchfield Army Community Hospital (BACH), Bldg 650 Joel Drive
- Ft Campbell Dependent Schools for schools only, Bldg 1110, Falcon Loop

NOTE: Troop Self Help will issue one for one exchange of bulbs to units and activities with an established account. Do Not Purchase Fluorescent tubes/lights on Government credit card (GPC).

Fluorescent tubes boxed, labeled and sealed.

GENERAL INFORMATION

All used bulbs are recycled, even the low level mercury-containing ones. For additional information contact **Environmental Division Hazardous Waste**.

ENV HB Page A-31

Universal Waste Fluorescent Lamps

- Mark / label the container
- Date the label
- Keep the container closed

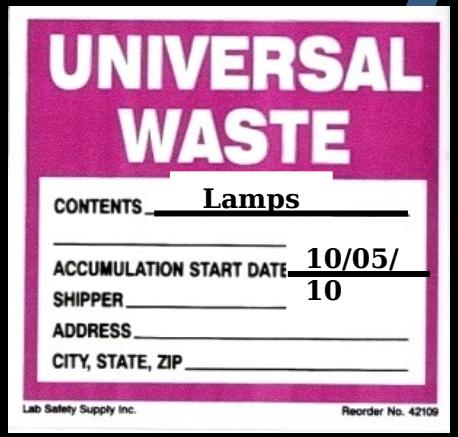
<u>Do not</u> place lamps in refuse dumpsters

Universal Waste Lamps

Authorized Locations

Troop Self-Help, Bldg. 863
Boeing Sikorsky, Bldg. 7281
BACH, J&J Maintenance, Room 1BJ03, off the loading dock.
AAFES Main Exchange, Bldg. 2840, Warehouse

Universal Waste Label



"Universal Waste Lamps"

and

Accumulation Start Date

Universal Waste Lamps

05 OCT 2010

MARKING

Appointed EQO:_____ Phone:_____

Satellite Accumulation Point Operation Procedures for Easy Compliance

- For waste turn-in, call—270.798.9790
- Technical assistance—270.798.9763/9105

Hazardous Waste (HW)

1] Accumulation: no more than 55 gallons of HW or 1 quart of acute toxic waste.
2] Containers: keep clean, serviceable and kept closed at all times.
3] Label(s): contents are identified and no accumulation date(s).
4] Fill date: when container becomes full. (D/M/Y)
5] Call for pick-up: prepare DD Form 1348-1A if required or fill the PWBC-Waste Turn-in Log and get stamped for receipt of turn-in.
6] 6-Part Folder: Must be maintained as directed in the EQO Handbook.

Mask Filters
M-Kits

Universal Waste Site (UWS)

1] Accumulation: no more than six (6) months.
2] Containers: keep clean, serviceable and kept closed at all times.
3] Label(s): contents are identified and labeled UNIVERSAL WASTE and dated the day the FIRST spent lamp/battery is deposited at the accumulation site.
4] Call for pick-up: prepare DD Form 1348-1A if required or fill the PWBC-Waste Turn-in Log and get stamped for receipt of turn-in.
6] 6-Part Folder: Must be maintained as directed in the EQO Handbook.

Know who your appointed Environmental Quality Officer (EQO) is!!

Non-Lead Acid Batteries

Alkaline
Lithium
Nickel Cadmium
Magnesium
Ni-Cad
Mercury
& other
chargeable Batteri

ontact the PPOC t
Schedule Pick-up

ENV HB Page

Do Not

- Segrega
- Tape
- Dischar

Manage as
Used Batterie

Waste
Determination
is made
at the PPOC

BATTERIES (NON-LEAD-ACID)

Alkaline, Lithium, Nickel-Cadmium, Magnesium, NiCad, Mercury and Other Rechargeable Batteries

POSSIBLE AREAS OF CONCERN

Alkaline, Lithium, Nickel-Cadmium, Magnesium, NiCad (wet), Mercury, Lithium-Ion, Nickel Metal Hydride and Rechargeable Batteries have chemicals that are a concern during routine use and disposal.

CHARACTERIZATION

All Lithium, Lithium-Ion, Nickel Metal Hydride, Nickel-Cadmium, Magnesium, and Mercury batteries may be Universal Waste. As a best management practice, all batteries will be collected as Used Batteries, and waste determinations will be made by **PPOC Battery Program** personnel upon turn in.

HANDLING PROCEDURES

Step 1 Battalion level unit Commo/S6/Activity contact **PPOC Battery Program** to establish program. (i.e., quantity, type, inventory, location).

Step 2 Unit will maintain a Bench Stock. UBL will be maintained by **PPOC Battery Program.**

Step 3 Unit/activity will secure an approved plastic container with closeable top.

Step 4 Container will be labeled "Used Batteries" by way of printed label or by writing "Used Batteries" on the container.

Step 5 Individual will sign out batteries from unit battery storage area.

Step 6 When returning used batteries, individual will sign battery in, place it in Used Batteries container and get replacement (step 5).

Step 7 The Used Batteries container will be picked up by PPOC personnel, and the PPOC will provide a replacement container. Contact **PPOC Battery Program** to schedule pick up.

NOTE: DO NOT DISCHARGE LITHIUM COMMO BATTERIES ON FT. CAMPBELL. THEY WILL BE TESTED AND EVALUATED FOR CONTINUED USE.

NOTE: Directorates contact PPOC Battery Program for battery supply and turn in.

Lithium, Nickel-Cadmium (NiCad), Lithium-Ion, Nickel Metal Hydride Magnesium, and Mercury batteries may be Universal Waste.

BMP: Alkaline batteries should/may be placed in the "Used Batteries" container for convenience and appropriate sorting. Regulations allow alkaline batteries to be discarded in the regular refuse (solid waste) stream.

GENERAL INFORMATION

Alkaline batteries (AA, AAA, C, D, 9V) may be returned to the unit battery return area. For additional information contact **PPOC Battery Program.**

NiCad Aviation Batteries and Solid Lead Acid Batteries

Turn in at PPOC

NiCad Aviation Battery

SLAB Batteries

ENV HB Page

Lead Acid "Exide" Batteries

Establish Exide Program through SSA

ENV HB Page

Lead Acid "Government" Vehicle Batteries

Contact DRMO for turn in

ENV HB Page

Lead Acid "Non-Government" Vehicles and Equipment

Turn in at the Convenience Center or the Purchase Location

ENV HB Page

Satellite Accumulation Point Operations

SAP Operator Training – Module Five

POL Accumulation Points

Used Oil

Used Antifreeze

Recyclable Fuels

Best Management Practices

Used Oil (POL) Accumulation

ENV HB Page

Used oil is recyclable. If recycled IAW RCRA, it's labeled "Used Oil" and is accumulated at POL sites at maintenance areas.

Accumulate these in the Used Oil container.

Motor oils, Diesel fuel, Kerosene, JP-8, Transmission fluid, Hydraulic fluid, Brake fluid, Heating oil and Synthetic oil.

Do Not Mix with Used Oil.

Mogas, Unleaded fuels, and Coleman White Fuel.

Accumulate these separately as a Recyclable Fuel. Units/Activities with Recyclable Fuel in 5 gallon fuel cans will transport them to the PPOC for recycling.

Recyclable JP-8: Large quantities of JP-8 (pulled out of AVN POL Platoon tankers) will be set in the platoon's POL site and will not be mixed with anything. This fuel is recycled and used in ground vehicles.

- ***Container <u>and</u> SCU Must be Labeled.***
- ***EQO's must train all personnel handling POL products.***
- ***All accumulation drums must be metal except for Antifreeze.***

OIL (USED)

USED OIL includes all of the following items: Motor Oil, Diesel Fuel, Transmission Fluid, Brake Fluid, Hydraulic Fluid, Synthetic Oils, Heating Oil, Kerosene, and less than 55 gallons of JP8

POSSIBLE AREAS OF CONCERN

Used Oil potentially contains traces of metals such as chromium, cadmium and lead. Used oil items have a flash point above 100 degrees F.

CHARACTERIZATION

Used petroleum-based and synthetic oils are non-hazardous industrial wastes and are collected on the installation for recycling. Used Oil recycling generates money for MWR programs.

HANDLING PROCEDURES

Step 1 Establish your POL point by contacting the DPW **Environmental Division, Hazardous Waste Section**.

Step 2 Obtain a 55-gallon metal drum and Secondary Containment Unit (SCU) by contacting **PPOC Services.**

Step 3 Ensure the drums and the SCU are marked **"Used Oil"**

Step 4 Place Used Oil in the drum. Keep drum and SCU closed except when adding or removing contents. Locking is not required, but it will assist to keep SCU closed.

Step 5 Contact **PPOC HazWaste Pick Up** for disposal.

NOTE: SCU must be located in an area accessible by a large truck for easy removal.

NOTE: **Do Not mix Used Oil with antifreeze. If antifreeze is contaminated with Oil, contact PPOC Support to get additional guidance.**

NOTE: Drip pans/SCU with oil and water should not be poured in Used Oil container. See Drip Pan guidance for disposal suggestions.

NOTE: Oil carts should be emptied daily and not used for storage.

Used Oil SCU

Used Oil may be placed in your return locker for pickup

GENERAL INFORMATION

No solvents or other hazardous wastes can be mixed with Used Oil. If hazardous waste (brake cleaner, parts/weapons cleaner solvent) has been mixed with the oil, contact **PPOC Services**. Incidental amounts (less than 55 gallons) of fuels such as JP8 and diesel may be combined with the Used Oil. For quantities greater than 55 gallons, see protocol sheet, "Fuel JP8 Large Quantity," pg A-33. DO NOT place MOGAS or Coleman Fuel in the Used Oil container. These items must be transported to the PPOC for disposal.

"Used Oil"

SCU's may be obtained through the PPOC

ENV HB Page

Mark Container and SCU "Used Oil"

Do Not Mix
Solvents
Antifreeze
Gasoline
Other HW

Used Oil (POL) Accumulation

Used Oil and Oil Filters

- **"Used Oil"** means any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by chemical or physical impurities.
- **Used oil will only be disposed of as waste when it cannot be recycled or burned for its energy value.**
- **Waste oil to be disposed of must be evaluated** to determine whether it exhibits a hazardous waste characteristic or contains a listed hazardous waste.

Includes:

Oil filters

Oil-soaked absorbent materials

Oily rags that are not recycled

Do the right thing, keep in compliance and Protect the Environment

Used POL and Used Antifreeze Accumulation Points Procedures

Appointed EQO:_____ Phone:_____

Used Oil Accumulation

Proper labeling
"Used Oil"

Keep Closed
Unless adding or removing used oil

Keep Clean / Inspect Weekly

Secondary Containment Unit (SCU)
Liquids Only and Must be Labeled Same as Drum

"Used Oil" includes: Motor oils, JP-8, diesel fuel, kerosene, heating oil, synthetic oil, transmission, hydraulic and brake fluids. Used oil is stored in steel drums only.

Used Antifreeze Accumulation

Proper labeling
"Used Antifreeze"

Keep Closed
Unless adding or removing antifreeze

Keep Clean / Inspect Weekly

Secondary Containment Unit (SCU)
Liquids Only and Must be Labeled Same as Drum

"Used Antifreeze" containers will be white or blue poly containers, only.

NO SMOKING WITHIN 50 FEET

Emergency or Spill = 911 **For Pick-up or Pumping Call = 798.9790**

For additional guidance, See Environmental 101 Handbook at www.campbell.army.mil/envdiv

Used Oil (POL) Accumulation

Used Oil and Oil Filters

- Used oil that is mixed with hazardous waste or contains more than 1000 ppm total halogens is presumed to be hazardous waste.

- Transporters are required to analyze each shipment of waste oil for halogen concentrations. [40 CFR § 279.10(b) and § 279.44]

Use POL and Used Antifreeze Accumulation Point Procedures

Schedule turn-in or drop-off appointment for Hazardous/Universal Wastes

798-9790

Used Oil, Recyclable Fuel and Used

Common Problems

- No POL Poster
- EQO Information not posted or incor
- SCU not accessible for pumping
- Bung caps not secured
- Funnel left in container opening
- Cross contamination (Used Oil/Antifr
- Dry sweep, Water, FOD in SCU
- General Housekeeping

RCRA USED OIL and RECYCLEABLE FUEL INSPECTION CHECKLIST
USED ANTIFREEZE INSPECTION CHECKLIST

UNIT: _____

INSPECTOR: MSG John E. Tuttle
SSG Neville M. Watkins
Daniel N. Hixson

POL ONSITE: *USED OIL* *USED ANTIFREEZE* *RECYCLABLE FUEL*

_____
INSPECTOR'S SIGNATURE

INSPECTION DATE: _____

PHONE: 270-798-9763 / 270-798-9105

BLDG. #: _____

NEXT EQO CLASS: _____

RCRA COMPLIANCE	YES	NO	REMARKS / CORRECTIVE ACTIONS	
Containers stored in secondary containment unit (SCU) preventing entry into the environment and responses to releases **[40 CFR 279.22(d)]**.				TT01 CM04
Container / tank labeled or marked properly, "used oil", "recyclable fuel," **[40 CFR 279.22(c)(1)]** and "used antifreeze."				TT01 CM04
Container / tank closed except when adding or removing POL ensures no release to the environment **[40 CFR 279.22(d)]**.			Bung loose or missing: YES NO	TT01 CM04
Container / tank condition: in good condition (no severe rusting, apparent structural defects, or deterioration) **[40 CFR 279.22(b)(1)]**.				TT01 CM04
Container / tank condition: not leaking (no visible leaks) **[40 CFR 279.22(b)(2)]**.				TT01 CM04
Above ground / underground storage tank fill pipes marked / labeled "used oil" **[40 CFR 279.22(c)(2)]**.				TT01 CM04
BMP / OSHA COMPLIANCE	**YES**	**NO**	**REMARKS / CORRECTIVE ACTIONS**	
Has an EQO been assigned via orders to your unit? (Program BMP)			EQO Name / Phone: _____	
Container / tank under control of the operator. (Program BMP)				
POL Poster on-site for training operators. (Program BMP)				

HELPFUL NUMBERS	UNIT / ACTIVITY SITE REPRESENTATIVE
Environmental Training: Bob Fletcher, 798-9595 **Command Safety:** 798-6789/2327 **Preventive Medicine:** 798-8695 **Haz Waste Program Manager:** Bill Baggett, 798-9786 **Haz Waste / POL Support:** Dan Hixson, 798-9763 **Special Duty NCO(s):** 798-9783/9105	**PRINTED NAME**: _____ **PHONE NUMBER**: _____ **SIGNATURE**: _____

FOR USED OIL AND ANTIFREEZE PICK-UP, CALL 270-798-9790
RECYCLABLE FUEL (MOGAS, UNLEADED FUEL, AND COLEMAN FUEL) IS STORED IN 5 GALLON FUEL CANS AND TAKEN TO THE PPOC AT 2ND STREET AND WICKHAM.

Version: 03 MAR 10

POL Accumulation Point

How to Establish a POL Site

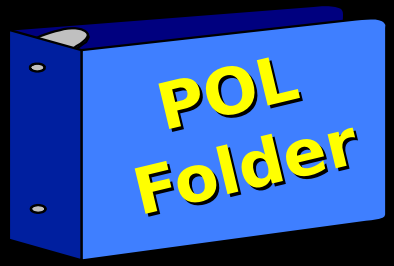
ENV HB Page

1. Refer to the Antifreeze and/or “Oil (Used)” protocol sheet and call Environmental Division Hazardous Waste Section for help.

2. Forward a memo, signed by the Commander and EQO requesting establishment of a POL site, to the Hazardous Waste Program Manager. Also provide a diagram depicting the POL site location.

3. Maintain a folder documenting the POL site memo and diagram, training documentation, and inspection sheets (weekly and monthly) . Records of training must be maintained for 3 years.

4. Initial and annual Oil Handling Personnel training is required for bulk quantities greater than or



Site Certification and Admin

Commander/Director Memo
Site Specific Drawing
Weekly & Monthly Inspections

Commander/ Director Memo

DEPARTMENT OF THE ARMY

_____

_____

Fort Campbell, Kentucky 42223

AFZB-_____ _____
Date

MEMORANDUM FOR The Environmental Division, Pollution Prevention Branch

SUBJECT: Request Establishment of a Petroleum, Oil, and Lubricant (POL) Accumulation Point

1. Request establishment of the POL at the following unit/activity _____.

2. The estimated date of establishment will be _____.

3. This POL site is located in building _____ located near the intersection of _____ in room _____.

4. The POL at this location will be used to accumulate POL waste IAW applicable regulations. All waste containers will be emptied by calling the PPOC at 3rd and Wickham Ave. (798.9790). Forward this memorandum to the Environmental Division's Pollution Prevention Branch (798.9763/9105) and place a copy in your site spill plan folder. Secondary containment units (SCU) will be used at the site. POC for secondary container units (SCUs) is the Environmental Division (798.3105).

5. The Environmental Quality Officer (EQO) is _____ and can be contacted at phone number _____.

6. The point of contact for this memorandum is _____ and can be contacted at phone number _____.

_____

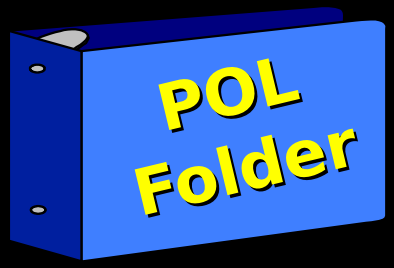
_____

Commanding

_____

_____

Environmental Quality Officer



Site Certification and Admin

Commander/Director Memo
Site Specific Drawing
Weekly & Monthly Inspections

Site Specific Drawing

Unit / Activity

DESERT STORM AVE.

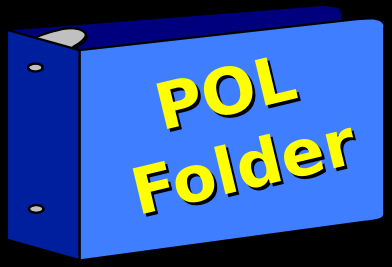
NORTH

LOADING DOCK

LOADING DOCK

POL

AIRBORNE AVE.



Site Certification and Ac

Commander/Director Memo
Site Specific Drawing
Weekly & Monthly Inspections

Weekly Inspection

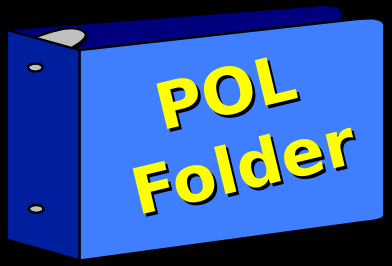
POL COLLECTION SITE - WEEKLY INSPECTION SHEET

Inspection Requirements

1. Containers stored in secondary containment unit (SCU) preventing entry into the environment and responses to releases.
2. SCU and each container/tank labeled or marked properly, "used oil", "recyclable fuel," or "used antifreeze."
3. Each container/tank closed except when adding or removing POL.
4. Container/tank condition: in good condition (no severe rusting, apparent structural defects, or deterioration.
5. Container/tank condition: not leaking (no visible leaks).
6. Above ground / underground storage tank fill pipes marked / labeled "used oil".
7. Container / tank under control of the operator.
8. POL Poster on-site for training operators.

NOTE: List each deficiency found on a single line. Annotate results even if no deficiencies were found in the "Deficiency" block.

Date	Print Inspector' Name	Deficiency	Corrective action taken	Date & Initial



Site Certification and Admin

Commander/Director Memo
Site Specific Drawing
Weekly & Monthly Inspections

Monthly Inspection

RCRA USED OIL and RECYCLEABLE FUEL INSPECTION CHECKLIST
USED ANTIFREEZE INSPECTION CHECKLIST

UNIT: _____

INSPECTOR: MSG John E. Tuttle
SSG Neville M. Watkins
Daniel N. Hixson

POL ONSITE: *USED OIL* *USED ANTIFREEZE*
RECYCLABLE FUEL

_____
INSPECTOR'S SIGNATURE

INSPECTION DATE: _____

PHONE: 270-798-9763 / 270-798-9105

BLDG. #: _____

NEXT EQO CLASS: _____

RCRA COMPLIANCE	YES	NO	REMARKS / CORRECTIVE ACTIONS	
Containers stored in secondary containment unit (SCU) preventing entry into the environment and responses to releases [40 CFR 279.22(d)].				TT01 CM04
Container / tank labeled or marked properly, "used oil", "recyclable fuel," [40 CFR 279.22(c)(1)] and "used antifreeze."				TT01 CM04
Container / tank closed except when adding or removing POL ensures no release to the environment [40 CFR 279.22(d)].			Bung loose or missing: YES NO	TT01 CM04
Container / tank condition: in good condition (no severe rusting, apparent structural defects, or deterioration) [40 CFR 279.22(b)(1)].				TT01 CM04
Container / tank condition: not leaking (no visible leaks) [40 CFR 279.22(b)(2)].				TT01 CM04
Above ground / underground storage tank fill pipes marked / labeled "used oil" [40 CFR 279.22(c)(2)].				TT01 CM04
BMP / OSHA COMPLIANCE	**YES**	**NO**	**REMARKS / CORRECTIVE ACTIONS**	
Has an EQO been assigned via orders to your unit? (Program BMP)			EQO Name / Phone: _____	
Container / tank under control of the operator. (Program BMP)				
POL Poster on-site for training operators. (Program BMP)				

HELPFUL NUMBERS	UNIT / ACTIVITY SITE REPRESENTATIVE
Environmental Training: Bob Fletcher, 798-9595 **Command Safety:** 798-6789/2327 **Preventive Medicine:** 798-8695 **Haz Waste Program Manager:** Bill Baggett, 798-9786 **Haz Waste / POL Support:** Dan Hixson, 798-9763 **Special Duty NCO(s):** 798-9783/9105	**PRINTED NAME**: _____ **PHONE NUMBER**: _____ **SIGNATURE**: _____

FOR USED OIL AND ANTIFREEZE PICK-UP, CALL 270-798-9790
RECYCLABLE FUEL (MOGAS, UNLEADED FUEL, AND COLEMAN FUEL) IS STORED IN 5 GALLON FUEL CANS AND TAKEN TO THE PPOC AT 2ND STREET AND WICKHAM.

Version: 03 MAR 10

POL Accumulation Point

How to Close a POL Site

ENV HB Page

If all vehicles and generators are deployed and there is no need to accumulate POL products, close the POL accumulation point.

1. Submit a POL Accumulation Point closure memo signed by the Commander and EQO to the Environmental Division (798-9763).

2. Call 798-9790 to have the Used Oil and Used Antifreeze removed from accumulation drums.

3. Secure POL secondary containment units (SCU) until the unit returns to Fort Campbell or coordinate turn-in. Serviceable SCUs - PPOC (798-9790). Unserviceable SCUs - DRMO (798-3525).

POL Contaminated Rags

Deliver to Post Laundry

5 lb or less can be bagged and taken to the PPOC

RAGS

POSSIBLE AREAS OF CONCERN

Cloth rags saturated with POL or other materials may be flammable and/or toxic.

CHARACTERIZATION

Cloth rags contaminated with POL are considered **non-hazardous waste**.

CONTAINER MARKING AND HANDLING PROCEDURES

Step 1 Deliver USED POL RAGS to **Post Laundry** in a metal can with unit name and container lid in place. Units must have a current signature card (DA 1687). Turn-around time is five working days.

Step 2 Post Laundry will launder rags, place clean rags into your container and will notify you to pick up your clean rags.

Step 3 If the unit does not want the rags returned, post laundry will keep the rags for another unit that may need them.

NOTE: See page A-70 for rags contaminated with items other than POL products.

Rags may be toxic/flammable depending on the contaminant.

NOTE: POL-contaminated rags may be bagged and placed in return locker (5 lbs or less) or larger quantities may be taken to PPOC for disposal.

GENERAL INFORMATION

For additional information contact **PPOC Services**.

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Rags Contaminated with Solvents or other Hazmat

Bag, Label, and Place in the Hazmat Return Locker

Emergency Procedures & Prevention

Fuel / POL Spills

This is an UNCONTROLLED DOCUMENT printed for reference only.
The controlled document is on-line on the Fort Campbell Internet under Directorate of Public Works, Environmental Division.
http://www.campbell.army.mil/campbell/directorates/DPW/envdiv/Pages/default.aspx

FUEL/ POL SPILLS

Reporting, Safety, Clean-Up

POSSIBLE AREAS OF CONCERN

Failure to properly clean up spills violates State and Federal regulations and causes concerns to human health and safety.

CHARACTERIZATION

Improperly discharged petroleum, oil, or lubricant (POL) products.

HANDLING PROCEDURES

Step 1 BE PREPARED
- Know response material locations
- Know response procedures

Step 2 BE SAFE
- Identify spilled substance / Read MSDS
- Use personal protective equipment if trained and be familiar with the spilled material.

Step 3 When to Call?
a. Greater than 10 gallons
b. Three (3) feet squared
c. Enters any water source including lakes, rivers, streams, retention areas, or groundwater

Step 4 NOTIFY
- Tell your supervisor
- Fort Campbell Emergency Dispatch 911
- Range Control (if in Training Area) 798.3001
- SPCC/Storage Tank Program 798.9637/9601

Step 5 WHAT TO REPORT
- Location and address of release
- Name and phone number of POC
- Date and time of release
- Type and quantity of substance
- Cause and source of release

Step 6 STOP THE SOURCE
- Plug, roll, or right drums
- Use emergency shut-off devices

Spill Kit Materials

Step 7 PROTECT WATER
- Confine the spill with sandbags or booms
- Block access to storm water grates

Step 8 CLEAN UP
- Pump or sweep into a safe container

Step 9 DISPOSE
- Contain waste water or sweepings
- Call **PPOC** for proper disposal

Step 10 RESTOCK AND REVIEW
- Replace other materials and equipment
- Review the incident for lessons learned

GENERAL INFORMATION

Spills that occur off-post or on other installations should be reported to the unit chain of command and the local governmental agency. Additional spill assistance/guidance may also be obtained from the **Environmental Division Spill/Storage Tank Program.**

For Spills related to Hazardous Substances or other hazardous materials see protocol sheet A-43

ENV HB Page A-36

>10 Gallons or 3 ft ^{2} or Enters Any Water Source

THANK YOU !

Environmental Division POC's

Bill Baggett (Hazardous Waste Manager) 798-9786

Dan Hixson (SAP Training & Compliance) 798-9763

Inspectors (Special Duty NCOs) 798-9105